



MFC NYETAA

MALI-FOLKECENTER

BONNE GOUVERNANCE - DÉVELOPPEMENT ÉCONOMIQUE LOCAL - ENVIRONNEMENT

FALADIÉ SEMA
RUE 800, PORTE 1293
BAMAKO
REPUBLIQUE DU MALI

T. +223 2020 0617
F. +223 2020 0618

WWW.MALIFOLKECENTER.ORG

ENVIRONMENTAL AND SOCIAL POLICY AND ITS IMPLEMENTATION GUIDE

Approved by the Board of Directions: March, 11th 2025

Replaces Version 2020 (Resolution No. 17/02/20 CA / MFC Nyetaa)

Table des matières

<i>LIST OF ACRONYMS AND ABBREVIATIONS</i>	3
<i>INTRODUCTION</i>	4
<i>I. CONTEXT AND RATIONALE FOR THE POLICY</i>	5
<i>II. OBJECTIVES AND PRINCIPLES OF THE E&S POLICY</i>	7
<i>III. ENVIRONMENTAL AND SOCIAL STANDARDS (ESS)</i>	8
<i>IV. ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)</i>	12
<i>V. E&S MANAGEMENT PROCEDURE – TEN (10) STEPS</i>	14
<i>VI. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)</i>	15
<i>VII. STAKEHOLDER ENGAGEMENT AND DISCLOSURE</i>	16
<i>VIII. GRIEVANCE REDRESS MECHANISM (GRM)</i>	17
<i>IX. E&S MONITORING, REPORTING AND AUDIT</i>	18
<i>X. E&S CAPACITY BUILDING</i>	19
<i>XI. COHERENCE WITH OTHER MFC NYETAA POLICIES</i>	19
<i>XII. ENTRY INTO FORCE AND REVIEW</i>	20
<i>ANNEX 1: ENVIRONMENTAL AND SOCIAL SCREENING FORM</i>	21
<i>ANNEX 2: E&S COMPLAINT SUBMISSION FORM</i>	23
<i>ANNEX 3: ESMP TEMPLATE</i>	24
<i>ANNEX 4: STAKEHOLDER CONSULTATION REGISTER</i>	25

LIST OF ACRONYMS AND ABBREVIATIONS

Acronym	Full Form
AfDB	African Development Bank
BEI	Ethics and Integrity Office of MFC Nyetaa
BoD	Board of Directors
CITES	Convention on International Trade in Endangered Species
CBD	Convention on Biological Diversity
CREDD	Strategic Framework for Economic Recovery and Sustainable Development (Mali)
DNACPN	National Directorate for Sanitation, Pollution Control and Nuisances
DQHSE	Quality, Hygiene, Safety and Environment Department
DRACPN	Regional Directorate for Sanitation, Pollution Control and Nuisances
EHS	Environmental, Health and Safety
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
ESMP	Environmental and Social Management Plan
ESP	Environmental and Social Policy
GCP	Grievance Committee / Complaints Panel
GHG	Greenhouse Gas
GRM	Grievance Redress Mechanism
IFC	International Finance Corporation
IFI	International Financial Institutions
ILO	International Labour Organization
IPPC	International Plant Protection Convention
LMP	Labour Management Procedures
MFC	Mali-Folkecenter Nyetaa
NDC	Nationally Determined Contribution
NIES	Environmental and Social Notice (simplified assessment)
OHSP	Occupational Health and Safety Plan
PAP	Project-Affected Person
PS	Performance Standard (IFC)
RAP	Resettlement Action Plan
SEAH	Sexual Exploitation, Abuse and Harassment
UNFCCC	United Nations Framework Convention on Climate Change
VBG / GBV	Gender-Based Violence
WBP	Whistleblower Protection Policy

INTRODUCTION

Mali-Folkecenter Nyetaa (MFC Nyetaa) is a Malian Non-Governmental Organisation founded in 1999, governed by Law No. 04-038 of 5 August 2004. As a signatory to framework agreement No. 02341001161 with the Malian State (20 February 2008), MFC Nyetaa operates in the fields of renewable energy, climate change adaptation and mitigation, local economic development, and environmental protection.

MFC Nyetaa's activities agricultural projects, renewable energy systems, rural infrastructure, climate resilience programmes generate interactions with both biophysical and human environments. MFC Nyetaa therefore has a responsibility to identify, assess, prevent and manage the environmental and social (E&S) risks and impacts associated with these interventions.

This Environmental and Social Policy (ESP 2025) is a comprehensive update of the version adopted in 2020. It integrates the requirements of the International Finance Corporation Performance Standards (IFC/PS 1–8), the standards of International Financial Institutions (IFIs) and international best practices in environmental and social management. It takes into account the contextual realities of Sahelian Mali, national laws, and international conventions ratified by Mali.

This document consists of two parts:

- PART I : The Environmental and Social Policy: principles, objectives, standards and requirements;
- PART II : The Implementation Guide: the Environmental and Social Management System (ESMS), procedural steps, tools and institutional mechanisms.

PART ONE: ENVIRONMENTAL AND SOCIAL POLICY

I. CONTEXT AND RATIONALE FOR THE POLICY

1.1. General Context of Mali

Mali, a vast Sahelian country covering 1,241,238 km², is one of the countries most vulnerable to the effects of climate change. Its four bioclimatic zones — Saharan, Sahelian, Sudanian and Sudano-Guinean — contain fragile ecosystems under increasing pressure from climate variability, demographic growth (3.6% annual growth rate) and unsustainable natural resource exploitation practices.

Vegetation covers 44% of the territory but faces significant deforestation. The net greenhouse gas sequestration balance of the forestry sector stands at 220,505 kilotonnes/year, conferring on Mali the status of a "carbon sink". Preserving this natural capital is a strategic priority for the country's sustainable development.

1.2. Necessity of the E&S Policy

MFC Nyetaa operates in sectors (renewable energy, sustainable agriculture, climate resilience, land management) whose activities can generate both positive and negative impacts on natural and human environments. Rigorous management of these impacts is a requirement that is:

- Ethical: respect for community rights and environmental preservation;
- Legal: compliance with applicable Malian legislation;
- Institutional: alignment with the standards of national and international financial partners;
- Strategic: protection of MFC Nyetaa's reputation and sustainability of its funding.

1.3. Compliance with National Legislation

The ESP 2025 is grounded in the national legislative and regulatory framework, including in particular:

- Constitution of the Republic of Mali (2023), Art. 22: right to a healthy environment;
- Law No. 91-147 of 23/02/1991 on environmental protection;
- Decree No. 08-346/P-RM of 26 June 2008 on environmental and social impact assessment;
- Decree No. 09-318/P-RM of 26 June 2009 amending the ESIA decree;
- Mali Labour Code and its implementing texts;
- Mali Vision 2063
- Nationally Determined Contribution (NDC) of Mali

1.4. Compliance with International Conventions

Convention / Treaty	Adopted	Mali Status
International Plant Protection Convention (IPPC)	1951	31 Aug. 1987
African Convention on the Conservation of Nature (Algiers Convention)	1968	20 Jun. 1974
Convention on International Trade in Endangered Species (CITES)	1973	16 Oct. 1994
UN Framework Convention on Climate Change (UNFCCC)	1992	Ratified
Convention on Biological Diversity (CBD)	1992	Ratified
Paris Agreement on Climate Change	2015	Ratified
UN Convention to Combat Desertification (UNCCD)	1994	Ratified
Rotterdam Convention on Hazardous Chemicals	1998	Ratified

Stockholm Convention on Persistent Organic Pollutants	2001	Ratified
---	------	----------

1.5. Alignment with IFI Standards

MFC Nyetaa aligns its ESP with the standards recognised by the international financial institutions with which it collaborates, including:

- IFC Performance Standards (PS 1–8);
- World Bank Environmental, Health and Safety (EHS) Guidelines;
- African Development Bank (AfDB) Environmental and Social Standards;
- IASC minimum operating standards on PSEA;
- Equator Principles for projects with significant environmental impacts;
- ISO 14001 (environmental management) and ISO 45001 (occupational health and safety).

II. OBJECTIVES AND PRINCIPLES OF THE E&S POLICY

2.1. General Objective

The ESP 2025 aims to equip MFC Nyetaa with a robust, coherent framework aligned with international best practices to identify, assess, prevent, mitigate and manage the environmental and social risks and impacts generated by its projects and programmes, while maximising their benefits for communities and ecosystems.

2.2. Specific Objectives

- Prevent and mitigate negative impacts on biophysical and human environments;
- Ensure national regulatory compliance and alignment with IFI standards;
- Protect the rights, health and safety of workers, communities and beneficiaries;
- Mainstream gender and protection of vulnerable groups across all projects;
- Contribute to climate resilience and sustainable development goals;
- Strengthen confidence of financial partners through transparent, documented E&S management;
- Guarantee an accessible and equitable grievance redress mechanism.

2.3. Scope

The ESP 2025 applies without exception to:

- All projects and programmes implemented directly by MFC Nyetaa;
- Activities of implementing partners and sub-contractors funded or co-funded by MFC Nyetaa;
- All phases of the project cycle: design, preparation, implementation, monitoring/evaluation and closure;
- All intervention sites, including field sites, offices and training venues;
- All MFC Nyetaa staff, consultants, volunteers and partners.

2.4. Guiding Principles

Principle	Description
Precaution	In the absence of scientific certainty, take precautionary measures to prevent serious or irreversible harm to the environment or communities.
Mitigation Hierarchy	Avoid, then minimise, then mitigate, then compensate — in that order of priority — the identified negative impacts.

Participation	Engage stakeholders, including affected communities, at all stages of the project cycle.
Transparency	Disclose E&S assessments, management plans and monitoring results in formats accessible to stakeholders.
Integration	Incorporate E&S considerations from project design, not as a post-assessment exercise.
Gender & Equity	Ensure that women, youth and vulnerable groups participate in and benefit from projects on an equitable basis.
Climate Resilience	Integrate climate change adaptation and mitigation into project design and implementation.
Responsibility & Accountability	Designate clear E&S focal points and report E&S performance to stakeholders and partners.
Continuous Improvement	Continuously review and improve E&S management practices based on monitoring and audit results.

III. ENVIRONMENTAL AND SOCIAL STANDARDS (ESS)

The ten (10) Environmental and Social Standards below constitute the cornerstone of MFC Nyetaa's policy. They are aligned with the IFC Performance Standards and standards recognised by partner IFIs.

ESS 1 – Assessment and Management of E&S Risks and Impacts

Objective

Identify, assess and manage the environmental and social risks and impacts of a project throughout its lifecycle, in proportion to its nature, size and contextual sensitivity.

Key Requirements

- Conduct a preliminary E&S screening for every proposed project;
- Establish an Environmental and Social Management System (ESMS) proportionate to identified risks;
- Develop an Environmental and Social Management Plan (ESMP) for projects with moderate or substantial risks;
- Designate an E&S Officer within MFC Nyetaa to oversee implementation;
- Ensure disclosure and stakeholder consultation on E&S assessment findings;
- Document, monitor and report E&S performance to relevant financial partners.

ESS 2 – Labour and Working Conditions

Objective

Promote decent work, protect workers against occupational hazards, and prevent all forms of exploitation, discrimination, forced labour or child labour.

Key Requirements

- Comply with the Malian Labour Code and ILO Conventions (C87, C98, C138, C182, C111);
- Develop and implement Labour Management Procedures (LMP) for any project employing staff;
- Formally prohibit child labour (under 15 years) and forced labour;

- Ensure safe working conditions: PPE, HSS training, on-site emergency plan;
- Develop an Occupational Health and Safety Plan (OHSP) consistent with ISO 45001;
- Establish a workers-specific grievance redress mechanism;
- Prohibit all discrimination based on sex, ethnicity, religion, age or social status;
- Adopt and enforce a Code of Conduct including prohibition of all forms of GBV, SEAH and harassment, in line with MFC Nyetaa's PSEAH Policy;
- Guarantee fair, transparent remuneration paid in a timely manner.

ESS 3 – Resource Efficiency and Pollution Prevention

Objective

Avoid or minimise negative impacts on human health and the environment by reducing pollution, managing waste responsibly and optimising the use of natural resources.

Key Requirements

- Apply the 3R principle (Reduce, Recover, Reuse/Recycle) for solid waste;
- Establish a Waste Management Plan, including for hazardous waste;
- Monitor and control atmospheric emissions, noise and vibrations generated by activities;
- Adopt measures to conserve water, energy and raw materials;
- Promote renewable energy and clean technologies in project design;
- Prohibit the use of chemical substances listed under the Rotterdam and Stockholm Conventions;
- Systematically restore sites at project closure.

ESS 4 – Community Health, Safety and Security

Objective

Prevent and mitigate health and safety risks for communities adjacent to projects, anticipate emergencies and protect vulnerable populations.

Key Requirements

- Assess health and safety risks for communities at design and implementation stages;
- Establish a road safety plan for transport activities;
- Prevent accident and nuisance risks (dust, noise, water contamination);
- Develop an Emergency Plan covering: fires, industrial accidents, spills, conflicts;
- Identify vulnerable groups (women, children, persons with disabilities, elderly) and take specific protective measures;
- Ensure the safety of project-produced goods and services (storage, transport, distribution);
- Secure project infrastructure to prevent unauthorised access that poses a hazard.

ESS 5 – Land Acquisition and Involuntary Resettlement

Objective

Avoid or minimise involuntary resettlement, fairly compensate affected persons, and help restore or improve their livelihoods.

Key Requirements

- Prioritise, from the design stage, alternatives that avoid or reduce resettlement needs;
- Conduct a census of project-affected persons (PAPs) and assess their assets before any action;
- Develop a Resettlement Action Plan (RAP) whenever involuntary displacement is unavoidable;
- Ensure fair compensation, negotiated and paid before any displacement;
- Categorise PAPs according to their legal land tenure and guarantee their rights accordingly;
- Involve local and community authorities and PAP representatives throughout the process;
- Conduct post-resettlement monitoring to verify livelihood restoration.

ESS 6 – Biodiversity Conservation and Sustainable Natural Resource Management**Objective**

Protect and conserve biodiversity, ecosystem services and natural resources, and promote their sustainable management.

Key Requirements

- Assess potential impacts on natural habitats, species and protected areas at the screening stage;
- Prohibit any activity leading to significant degradation of critical habitats or protected species;
- Implement biodiversity compensation measures where residual impacts are unavoidable;
- Prohibit the introduction of invasive alien species without prior risk assessment;
- Ensure natural resource management activities (timber, water, pasture) respect sustainability thresholds;
- Comply with CITES, CBD and IPPC conventions for any activity involving wild fauna or flora;
- Promote agroforestry, soil conservation and reforestation as project components.

ESS 7 – Local Communities and Vulnerable Groups**Objective**

Guarantee full and effective participation of local communities and vulnerable groups in projects, protect their rights and ensure they receive equitable benefits.

Key Requirements

- Identify and map local communities and vulnerable groups in the intervention area;
- Conduct prior, free and informed consultations with representatives of these groups;
- Adapt consultation methods to cultural, linguistic and intergenerational realities;
- Prevent all forms of discrimination in access to project benefits;
- Implement specific activities promoting inclusion of women, youth and persons with disabilities;
- Document and integrate community concerns into project design and implementation;
- Ensure project closure does not leave communities in a more precarious situation.

ESS 8 – Cultural and Natural Heritage

Objective

Protect tangible and intangible cultural heritage, as well as natural sites of cultural importance, against degradation or destruction resulting from project activities.

Key Requirements

- Identify cultural and natural heritage sites in and around intervention areas;
- Include "chance finds" clauses in all physical works contracts;
- Consult relevant stakeholders on identified heritage and integrate their recommendations;
- Prepare an impact mitigation plan for heritage when impacts are unavoidable;
- Prohibit funding of projects causing serious and irreversible harm to listed heritage;
- Comply with UNESCO conventions and Malian heritage protection laws.

ESS 9 – Gender Mainstreaming and Social Equity

Objective

Ensure that projects contribute to gender equality, reduction of inequalities, and empowerment of women and marginalised groups.

Key Requirements

- Conduct a gender analysis at each phase of the project cycle (identification, formulation, implementation, evaluation);
- Define indicators disaggregated by sex, age and social category for results monitoring;
- Allocate specific activities and budgets for women's and youth empowerment;
- Prevent all forms of Gender-Based Violence (GBV) linked to project activities, in accordance with MFC Nyetaa's PSEAH Policy;
- Ensure balanced representation of women in project governance bodies;
- Ensure that project benefits (income, services, training) are equitably accessible to women and men.

ESS 10 – Climate Change and Resilience

Objective

Contribute to the climate resilience of communities and ecosystems, reduce GHG emissions, and integrate climate change adaptation into project design.

Key Requirements

- Assess the carbon footprint of projects and identify GHG reduction measures;
- Integrate climate impact adaptation measures into the design of long-term projects;
- Promote low-carbon technologies and nature-based solutions;
- Contribute to Mali's NDC objectives and UNFCCC commitments;
- Assess climate vulnerability of intervention areas and target groups;
- Document climate co-benefits of projects (carbon sequestration, energy efficiency, etc.).

PART TWO: ESP IMPLEMENTATION GUIDE

IV. ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)

4.1. What is the ESMS?

The Environmental and Social Management System (ESMS) is the structured set of policies, procedures, tools, human resources and institutional mechanisms that enable MFC Nyetaa to identify, assess, manage and monitor E&S risks and impacts from its activities in a systematic, proportionate and continuous manner.

MFC Nyetaa's ESMS is designed to be:

- Proportionate: adapted to the scale and nature of risks of each project;
- Integrated: embedded in project planning and management processes from design;
- Participatory: involving stakeholders at all stages;
- Documented: based on standardised tools, registers and reports;
- Adaptive: regularly reviewed based on audits, monitoring and stakeholder feedback.

4.2. E&S Roles and Responsibilities

Actor	E&S Responsibilities
Board of Directors (BoD)	Approve the ESP and its revisions. Oversee overall E&S performance. Receive annual E&S reports.
Executive Management	Provide institutional E&S leadership. Appoint the E&S Officer. Approve ESMPs and partner reports.
E&S Officer (focal point)	Coordinate ESMS implementation. Conduct or supervise E&S screenings and assessments. Ensure monitoring and preparation of E&S reports. Manage the GRM.
Ethics and Integrity Office (BEI)	Receive and process E&S complaints and allegations. Coordinate with the Whistleblower Protection Policy. Contribute to internal audits.
Project Managers	Integrate E&S requirements in project planning. Ensure ESMP application in the field. Report to the E&S Officer.
Implementing Partners	Comply with contractual E&S requirements. Develop and implement their Site ESMPs. Report any E&S incident to MFC Nyetaa.
Communities and Beneficiaries	Participate in E&S consultations. Use the grievance redress mechanism. Contribute to participatory impact monitoring.

4.3. Resources for the ESMS

MFC Nyetaa commits to allocating sufficient resources for ESMS implementation:

- Appoint a full-time or part-time E&S Officer depending on project volume;
- Systematically include an E&S budget in work plans and financing proposals (estimated at 3–5% of project costs for moderate-risk projects);
- Ensure ongoing staff training on E&S requirements;
- Mobilise external expertise for complex ESIA's.

4.4. ESMS Integration in the Project Cycle

Project Cycle Phase	Key E&S Activities
Identification / Design	Preliminary E&S screening – gender analysis – initial consultation – climate risk assessment
Formulation / Preparation	ESIA or NIES – ESMP development – LMP – stakeholder consultation – disclosure

Negotiation / Contracting	Integration of E&S clauses in contracts – Tender Documents with ESMP – Code of Conduct
Implementation	ESMP application – E&S monitoring – grievance management – periodic reporting
Closure	E&S closure audit – site restoration – final E&S report – lessons learned

V. E&S MANAGEMENT PROCEDURE – TEN (10) STEPS

MFC Nyetaa's environmental and social management procedure comprises ten (10) steps covering the entire management cycle, from sub-project screening through to post-completion monitoring. This procedure applies to any project or programme implemented or supported by MFC Nyetaa.

Step 1 – Site pre-selection and preparation of the technical file

The technical file for the sub-project is prepared by the entity responsible for its implementation. It includes technical details, location, resources used and planned activities. This file serves as the basis for initiating the E&S analysis.

Step 2 – Completion of the environmental and social screening form

MFC Nyetaa's E&S Officer, in collaboration with the DRACPN, completes a preliminary E&S assessment form to: (i) identify potential E&S impacts; (ii) verify land acquisition needs; (iii) inventory previous public consultations; (iv) propose the required study category. See Annex 1 – Screening Form.

E&S Risk Categorisation

Category	Nature of Impacts	Assessment Requirement
Substantial Risk (Category A)	Significant, varied, potentially irreversible impacts	Full ESIA + ESMP + RAP if displacement
Moderate Risk (Category B)	Limited, reversible, well-known impacts	NIES + simplified ESMP + RAP if required
Low Risk (Category C)	Negligible negative impacts	Prior declaration + minimum environmental prescriptions

Step 3 – Validation of the screening form and classification

The completed form is submitted to MFC Nyetaa's E&S Officer and, where necessary, to the DRACPN for approval. On this basis, MFC Nyetaa decides: (i) no formal study required, only environmental prescriptions; or (ii) mandatory conduct of an ESIA or NIES. A memorandum of understanding is signed with the DRACPN where applicable.

Step 4 – Conducting the environmental and social study (ESIA or NIES)

Where a study is required, MFC Nyetaa coordinates the preparation of terms of reference, recruitment of an accredited firm, conduct of the assessment (including public consultations), and production of the ESIA/NIES report. The report must include a gender analysis and climate risk assessment.

Step 5 – Approval of reports and obtaining the environmental authorisation

ESIA reports are submitted for validation to the DNACPN. The environmental authorisation is issued by the Minister responsible for the Environment (Category A) or by the DRACPN (Category B/NIES). This authorisation is a mandatory prerequisite to the commencement of works.

Step 6 – Public consultations and disclosure of E&S documents

Public consultations involve local communities, administrative and traditional authorities, civil society organisations and other stakeholders. E&S assessment findings are made public by MFC Nyetaa in formats accessible to affected communities (local languages, community meetings, public notices). A consultation register is maintained.

Step 7 – Integration of E&S requirements in Tender Documents

The ESMP is compulsorily integrated into tender documents for infrastructure projects. Tender documents require awarded companies to develop a Site ESMP and an Occupational Health and Safety Plan (OHSP) consistent with ISO 14001 and ISO 45001. Companies must also adopt and enforce a Code of Conduct prohibiting child labour, forced labour and all forms of GBV/SEAH.

Step 8 – Approval of the Site ESMP and OHS Plan

Prior to commencement of works, the awarded company submits the Site ESMP and OHSP for validation to MFC Nyetaa's E&S Officer, the Supervision Bureau (SB) and the DNACPN. The company may not begin work until formal approval of these documents is obtained.

Step 9 – Implementation of E&S measures

The company implements all E&S measures provided for in the validated plans. Implementation is supervised daily by Environment, Social and OHS specialists from the Supervision Bureau. The SB produces monthly E&S compliance reports submitted to MFC Nyetaa. Any deviation or non-compliance must be corrected within agreed timelines.

Step 10 – Environmental and social monitoring

E&S monitoring takes place at three levels: (i) Construction monitoring: proximity surveillance by the SB, monthly reports; (ii) End-of-works monitoring: independent audit, completion certificate conditional on E&S compliance; (iii) Operational monitoring: conducted by MFC Nyetaa's DQHSE, with quarterly reports and an annual independent audit. External monitoring is ensured by the DRACPN/DNACPN.

VI. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

6.1. ESMP Structure

The Environmental and Social Management Plan (ESMP) is the central operational instrument that translates ESIA/NIES findings into concrete prevention, mitigation and monitoring measures. It must be developed participatively and validated prior to the start of activities.

ESMP Component	Content
Mitigation Measures	Description of each mitigation measure for each identified impact
Responsibilities	Who is responsible for implementing each measure?
Schedule	When must each measure be implemented?
Costs	Estimated budget for each mitigation measure
Monitoring	Indicators, measurement frequency, monitoring responsibility
Reporting	Format and frequency of E&S performance reports

6.2. Specific Management Plans

Specific plans are developed for E&S issues requiring dedicated management:

- Atmospheric Emissions Management Plan;

- Noise and Vibration Management Plan;
- Soil and Water Pollution Prevention Plan;
- Waste Management Plan (solid, liquid, hazardous);
- Labour Management Procedures (LMP);
- Resettlement Action Plan (RAP) where applicable;
- Emergency and Crisis Management Plan;
- Social Integration and Inclusion Plan (gender, inclusion).

6.3. Labour Management Procedures (LMP)

In accordance with ESS 2, any project employing staff must have LMP covering:

- Description of worker categories (direct, contracted, community workers);
- Working conditions and remuneration consistent with the Malian Labour Code and ILO;
- Formal prohibition of child labour and forced labour;
- Personal protective equipment (PPE) and safety training;
- Workers' Code of Conduct (including prohibition of GBV/SEAH);
- Workers-specific grievance redress mechanism;
- Priority for local employment and training of community workers;
- Occupational health, hygiene and safety plans (OHSP).

VII. STAKEHOLDER ENGAGEMENT AND DISCLOSURE

7.1. Principles of Stakeholder Engagement

MFC Nyetaa commits to conducting a stakeholder engagement process that is:

- Early: initiated from the project identification phase, before any decision;
- Iterative: maintained throughout the project cycle;
- Inclusive: specifically targeting marginalised groups, women and youth;
- Culturally adapted: conducted in local languages (Bambara and other national languages);
- Documented: registers, minutes and attendance lists kept for each consultation;
- Transparent: consultation results communicated to stakeholders.

7.2. Consultation Steps

Consultation Step	Timing	Methods
Stakeholder identification	Project start	Stakeholder mapping, vulnerable group analysis
Initial consultation / Pre-information	Before screening	Community meetings, focus groups, individual interviews
Consultation on ESIA / NIES	During and after study	Public hearings, report dissemination, collection of views
Consultation on ESMP	Before start of activities	Presentation of mitigation measures, integration of feedback
Participatory monitoring	During implementation	Local monitoring committees, field visits with communities
Closure consultation	End of project	Participatory impact assessment, lessons learned

7.3. Disclosure of E&S Information

MFC Nyetaa commits to making the following E&S information public within appropriate timeframes and in accessible formats:

- This Environmental and Social Policy (MFC Nyetaa website);
- Screening and E&S categorisation results;
- ESIA / NIES reports and ESMPs (executive summaries in local languages if necessary);
- E&S monitoring reports (at least annually);
- Aggregated data from the Grievance Redress Mechanism;
- E&S performance reports submitted to financial partners.

VIII. GRIEVANCE REDRESS MECHANISM (GRM)

8.1. Objective and Principles

MFC Nyetaa's Grievance Redress Mechanism (GRM) enables any person or community affected or potentially affected by project activities to submit concerns, claims or complaints and to receive fair and timely responses.

The GRM is based on the following principles:

- Accessibility: free of charge, available in local languages, usable by illiterate persons;
- Confidentiality: complainant identity is protected, except with explicit consent;
- Non-retaliation: no adverse measure may be taken against a good-faith complainant;
- Impartiality: the GRM is managed by the Grievance Committee (GC), independent from project teams;
- Traceability: all complaints are registered and subject to documented follow-up;
- Complementarity: the GRM does not substitute for national administrative or judicial channels.

8.2. Complaint Submission Channels

- Physical submission: complaint form submitted to MFC Nyetaa, the implementing partner, or a dedicated on-site drop box;
- Telephone: dedicated line communicated to communities during consultations;
- Email: confidential address of the HR Department / BEI;
- Via community representatives or the local monitoring committee.

8.3. Types of Complaints and Processing Timeframes

Type of Complaint	Processing Body	Target Timeline
Project-related land disputes	GC + local authorities	20 days
Environmental damage (pollution, noise, etc.)	E&S Officer + GC	15 days
Land / economic rights violations (PAPs)	GC + RAP Committee	20 days
GBV / SEAH linked to project activities	BEI + PSEAH Protocol	Immediate – 72h
Working conditions / workers' rights	E&S Officer + GC	10 days
Errors in PAP identification or asset valuation	GC + project team	20 days
Other environmental or social complaints	GC	20 days

8.4. Processing Procedure

- Receipt and registration of the complaint in the GRM confidential register (24h);
- Acknowledgement of receipt communicated to the complainant (72h);
- Preliminary admissibility assessment by the GC (5 days);

- Investigation and instruction: evidence collection, interviews with parties (per timeline in table above);
- Resolution proposal: direct action or mediation with the parties;
- Decision and implementation: agreement signed between MFC Nyetaa and the complainant;
- Post-resolution follow-up: verification that the corrective measure has been effectively implemented;
- In case of non-agreement: referral to a competent authority (administrative, judicial).

8.5. Reporting and Continuous Improvement

A consolidated quarterly report on complaints (number, type, timelines, resolutions) is submitted to MFC Nyetaa's Management and included in E&S performance reports submitted to partners. Aggregated data are made public annually.

IX. E&S MONITORING, REPORTING AND AUDIT

9.1. E&S Monitoring System

MFC Nyetaa establishes a three-level E&S monitoring and evaluation system:

- Project level: continuous monitoring by project managers and implementing partners;
- Institutional level: consolidation and analysis by MFC Nyetaa's E&S Officer;
- External level: independent audits and DNACPN/DRACPN monitoring.

9.2. Key E&S Performance Indicators

E&S Domain	Indicators	Frequency
Biodiversity / ecosystems	Area reforested, number of protected species affected, % habitats conserved	Semi-annual
Water and air quality	Pollution parameters measured vs. Malian/WHO standards	Quarterly
Waste	Volume of waste generated, % recycled, pollution incidents	Monthly (works)
Labour	% local employment, occupational accidents, worker complaints resolved, training rate	Monthly
Gender	% women among beneficiaries, decision-making bodies, training received	Quarterly
Land and resettlement	Number of PAPs compensated, compensation timelines, % livelihood restoration	Ongoing
Complaints	Complaints received, average processing time, resolution rate	Monthly
Climate change	Tonnes CO2 avoided, area under resilient practices, households benefited	Annual

9.3. Reporting

MFC Nyetaa produces and submits the following E&S reports:

- Monthly site E&S compliance reports (submitted by the Supervision Bureau);
- Quarterly E&S performance reports for ongoing projects;
- Annual consolidated E&S performance report for MFC Nyetaa;
- Special reports in case of serious E&S incident (submitted within 72h to Management and relevant partners);

- Reports to financial partners in formats and frequencies defined in financing agreements.

9.4. E&S Audits

Independent E&S audits are conducted:

- At mid-term for each Category A or B project;
- At closure for each Category A project;
- Annually at institutional level (ESMS audit of MFC Nyetaa);
- At any time at the request of a financial partner.

Audit results are presented to the Board of Directors and communicated to partners. A corrective action plan is developed and monitored by MFC Nyetaa's BEI.

X. E&S CAPACITY BUILDING

MFC Nyetaa commits to building the E&S capacities of its staff, partners and communities. An annual E&S training plan is developed by the E&S Officer and submitted to Management for approval.

Target Audience	Training Themes	Frequency
All MFC Nyetaa staff	General E&S training, rights and obligations, Code of Conduct, GRM	At onboarding + annual
E&S Officer	Advanced ESMS training, screening, ESMP, E&S monitoring/evaluation, gender	At appointment + every 2 years
Project Managers	E&S risk management, LMP, stakeholder engagement	Per project + annual
Implementing Partners	MFC Nyetaa E&S requirements, Site ESMP, Code of Conduct, GRM	At start of each partnership
Field Staff	OHS procedures, PPE, emergency plan, incident reporting	Before each mission
Beneficiary Communities	E&S rights, GRM use, participation in monitoring	At project start

XI. COHERENCE WITH OTHER MFC NYETAA POLICIES

The ESP 2025 is part of MFC Nyetaa's overall institutional framework. It is coherent and complementary with the other policies adopted by the organisation:

Related Policy	Link with ESP 2025	Articulation Mechanism
PSEAH Policy 2025	Prevention of SEAH in activities. ESS 2 and ESS 9 refer to PSEAH obligations for all staff and partners.	SEAH Code of Conduct integrated in LMP and Tender Documents
Anti-Fraud and Corruption Policy	Integrity in E&S procurement. Prevention of corruption in environmental authorisation processes.	Selection criteria for E&S consulting firms
Whistleblower Protection Policy (WBP)	Protection of whistleblowers reporting E&S violations. GRM refers to WBP for retaliation cases.	Supplementary recourse channel to the GRM
MFC Nyetaa Gender Policy	ESS 9 and ESS 7 draw on the Gender Policy for analyses and gender indicators.	Gender analysis grid integrated in ESMPs
Financial Disclosure Policy	Disclosure of E&S budgets in financial statements. Traceability of ESMP expenditure.	Dedicated E&S budget line in financial reports

In the event of contradiction or ambiguity between this Policy and another MFC Nyetaa policy, the BEI and Executive Management shall jointly determine the applicable interpretation, giving priority to the standard that is most protective of beneficiaries and the environment.

XII. ENTRY INTO FORCE AND REVIEW

This Environmental and Social Policy 2025 enters into force on the date of its adoption by the MFC Nyetaa Board of Directors. It replaces and supersedes the version adopted by Resolution No. 17/02/20 CA / MFC Nyetaa.

The ESP shall be reviewed at a minimum every two (2) years or upon any significant change in:

- International financial partner standards;
- National legislative and regulatory framework;
- MFC Nyetaa's context of intervention or areas of activity.

Approved by:

The Board of Directors of Mali-Folkecenter Nyetaa

Effective Date: March 11th 2025

Dr. Ibrahim TOGOLA

Chairman of the Board of Directors
Knight of the National Order

Target Audience	Frequency
All MFC Nyetaa staff	Annual
E&S Officer	Annual
Project Managers	Before each mission
Implementing Partners	At start of each partnership
Field Staff	At project start
Beneficiary Communities	At project start

XI. COHERENCE WITH OTHER MFC NYETAA POLICIES

The ESP 2025 is part of MFC Nyetaa's overall institutional framework. It is coherent and complementary with the other policies adopted by the organisation:

Related Policy	Link with ESP 2025	Articulation Mechanism
PSEAH Policy 2023	Prevention of SEAH in activities. ESS 2 and ESS 9 refer to PSEAH obligations for all staff and partners.	SEAH Code of Conduct integrated in LMP and Tender Documents
Anti-Fraud and Corruption Policy	Integrity in E&S procurement. Prevention of corruption in environmental authorisation processes.	Selection criteria for E&S consulting firms
Whistleblower Protection Policy (WBP)	Protection of whistleblowers reporting E&S violations. GRM refers to WBP for retaliation cases.	Supplementary recourse channel to the GRM
MFC Nyetaa Gender Policy	ESS 9 and ESS 7 draw on the Gender Policy for analyses and gender indicators.	Gender analysis grid integrated in ESMPS
Financial Disclosure Policy	Disclosure of E&S budgets in financial statements. Traceability of ESMPS expenditure.	Dedicated E&S budget line in financial reports

ANNEX 1: ENVIRONMENTAL AND SOCIAL SCREENING FORM**A. PROJECT IDENTIFICATION**

Project / Sub-project Name	
Location (region, district, municipality)	
Project Owner / Lead Entity	
Assessor	
Date of Assessment	
Financing (donor)	

B. SCREENING QUESTIONS

Screening Question	Response
Does the project involve construction or infrastructure works?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is the project located in or near a protected area or sensitive natural habitat?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Will the project generate solid, liquid or hazardous waste?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does the project require land acquisition or could it result in displacement?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does the project involve the use of chemicals or pesticides?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Could the project affect cultural or natural heritage sites?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Could the project affect vulnerable groups (women, children, persons with disabilities, minorities)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Will the project generate significant atmospheric emissions, noise or vibrations?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does the project involve extraction or intensive use of natural resources?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does the project have potential impacts on climate change or biodiversity?	<input type="checkbox"/> Yes <input type="checkbox"/> No

C. PROPOSED CATEGORISATION

Proposed Category	<input type="checkbox"/> Category A (Substantial Risk) <input type="checkbox"/> Category B (Moderate Risk) <input type="checkbox"/> Category C (Low Risk)
E&S Study Required	<input type="checkbox"/> Full ESIA <input type="checkbox"/> NIES <input type="checkbox"/> No formal study
RAP Required?	<input type="checkbox"/> Yes <input type="checkbox"/> No

D. MINIMUM ENVIRONMENTAL PRESCRIPTIONS (if Category C)

--

<p>E&S Officer: Name: _____</p> <p>Signature: _____</p> <p>Date: ____ / ____ / ____</p>	<p>Validated by Management: Name: _____</p> <p>Signature: _____</p> <p>Date: ____ / ____ / ____</p>
---	---

ANNEX 2: E&S COMPLAINT SUBMISSION FORM

MALI-FOLKECENTER NYETAA | Grievance Redress Mechanism (GRM)

Any person or organisation affected or potentially affected by MFC Nyetaa's activities may use this form to submit a concern or complaint. Your complaint will be handled in full confidentiality.

SECTION A – COMPLAINANT INFORMATION

Full Name (optional)	
Village / Municipality / District	
Telephone Contact	
Do you wish to remain anonymous?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Preferred contact method	<input type="checkbox"/> Telephone <input type="checkbox"/> In person <input type="checkbox"/> Via community representative

SECTION B – COMPLAINT DESCRIPTION

Date(s) of incident or harm	
Location	
Project / Activity concerned	
Type of complaint	<input type="checkbox"/> Environmental impact <input type="checkbox"/> Social impact <input type="checkbox"/> Land/resettlement <input type="checkbox"/> Labour <input type="checkbox"/> GBV/SEAH <input type="checkbox"/> Other

Detailed description:

--

Solution sought by complainant:

--

Complainant signature (if applicable): Date: ____ / ____ / ____	Received by (GC/GRM): Name: _____ Date: ____ / ____ / ____ File No.: _____
--	---

ANNEX 3: ESMP TEMPLATE

MALI-FOLKECENTER NYETAA | To be adapted to the nature and scale of the project

A. PROJECT INFORMATION

Project Title	
Implementation Period	
E&S Category	
Total Project Budget	
E&S Budget	
Designated E&S Officer	

B. IMPACT MANAGEMENT MATRIX AND MITIGATION MEASURES

Identified Impact	Mitigation Measure	Cost (FCFA)	Responsible / Deadline
[Describe impact]	[Specify measure]	[Estimated cost]	[Responsible + Deadline]
[Describe impact]	[Specify measure]	[Estimated cost]	[Responsible + Deadline]
[Describe impact]	[Specify measure]	[Estimated cost]	[Responsible + Deadline]

C. E&S MONITORING PLAN

Indicator	Measurement Method	Frequency	Responsible
[Indicator]	[Method]	[Frequency]	[Responsible]
[Indicator]	[Method]	[Frequency]	[Responsible]
[Indicator]	[Method]	[Frequency]	[Responsible]

D. E&S BUDGET SUMMARY

Budget Item	Estimated Amount (FCFA)
E&S staff training	
Community consultations and awareness	
E&S studies and audits	
Implementation of mitigation measures	
E&S monitoring and reporting	
TOTAL E&S BUDGET	

ANNEX 4: STAKEHOLDER CONSULTATION REGISTER

MALI-FOLKECENTER NYETAA | To be completed for each consultation conducted

Project concerned	
Date of consultation	
Location	
Organised by	
Number of participants	
of whom women	

STAKEHOLDERS PRESENT

Name / Organisation	Role or Status	Contact

MAIN CONCERNS RAISED

--

MFC NYETAA RESPONSES AND COMMITMENTS

--

Consultation Facilitator: _____ Signature: _____ Date: _____