



ENVIRONMENTAL / DO NO HARM POLICY



PROTECT
Our Environment



RESPECT
Our Communities



PREVENT HARM
Promote Well-being

Safeguarding People. Protecting Nature. Building a Sustainable Future.



SUSTAINABILITY



INCLUSION



ACCOUNTABILITY



IMPACT

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1.0 INTRODUCTION

The *African Centre for Environment, Energy and Climate Advocacy (ACEECA)* is a non-governmental organization dedicated to advancing environmental sustainability, climate resilience, clean energy transition, and inclusive climate governance across Kenya.

Operating within increasingly complex environmental and socio-economic contexts, ACEECA recognizes that climate change, ecosystem degradation, and resource scarcity disproportionately affect vulnerable populations, particularly rural communities, women, youth, and marginalized groups. In response, the organization is committed not only to environmental protection but also to ensuring that all interventions are conflict-sensitive, socially responsible, and environmentally sustainable.

This Environmental and Do No Harm (DNH) Policy establishes a comprehensive and binding framework that guides the design, implementation, monitoring, and evaluation of all ACEECA programmes, projects, partnerships, and institutional operations.

The policy is grounded in internationally recognized environmental and social safeguard standards, including:

- United Nations Environmental and Social Safeguards (UNEP, UNDP, OCHA)
- World Bank Environmental and Social Framework (ESF)
- OECD Development Assistance Committee (OECD-DAC) Environmental Integration Principles
- Humanitarian Do No Harm Framework (Mary B. Anderson)

Through this policy, ACEECA affirms its commitment to ensuring that all interventions:

- **Prevent environmental degradation** by avoiding activities that contribute to

deforestation, pollution, biodiversity loss, land degradation, or ecosystem collapse.

- **Avoid unintended harm to people and ecosystems** by integrating risk assessment, conflict sensitivity, and environmental safeguards into all programming stages.
- **Strengthen resilience of vulnerable communities** by promoting adaptive capacity to climate change impacts, environmental shocks, and socio-economic stresses.
- **Promote sustainable and climate-positive development** by ensuring that all activities contribute to low-carbon, resource-efficient, and ecologically balanced development pathways.

This policy is therefore both a safeguard instrument and a strategic framework for ensuring that ACEECA's mission delivers positive, long-term environmental and social impact.

2.0 PURPOSE OF THE POLICY

The purpose of this Environmental and Do No Harm Policy is to institutionalize a structured approach to environmental protection and harm prevention across all ACEECA operations.

Specifically, the policy seeks to:

2.1 Mainstream Environmental Sustainability

To ensure that environmental considerations are fully integrated into ACEECA's strategic planning, program design, procurement processes, field implementation, and organizational decision-making systems.

2.2 Prevent Harm Across All Dimensions

To ensure that ACEECA interventions do not generate unintended negative consequences—whether environmental, social, economic, or

cultural—on communities, ecosystems, or stakeholders. This includes preventing:

- Environmental degradation and resource depletion
- Social exclusion or inequality arising from project targeting
- Economic disruption of local livelihoods
- Escalation of resource-based conflict

2.3 Establish Strong Safeguarding Systems

To create structured environmental and social safeguards that include risk screening, mitigation planning, compliance monitoring, and corrective action mechanisms throughout the project cycle.

2.4 Strengthen Institutional Accountability

To enhance transparency, responsibility, and ethical conduct by clearly defining environmental and Do No Harm responsibilities for staff, management, partners, consultants, and contractors.

2.5 Guide Ethical and Responsible Programming

To provide practical guidance for ensuring that all ACEECA interventions are designed and implemented in a way that is environmentally sound, socially inclusive, and aligned with international best practices in sustainable development.

3.0 POLICY OBJECTIVES

ACEECA commits to the following strategic environmental and Do No Harm objectives, which guide all institutional programming and partnerships:

3.1 Environmental Protection and Pollution Prevention

ACEECA shall actively work to prevent environmental degradation by ensuring that its activities do not contribute to:

- Air, water, or soil pollution

- Deforestation and land degradation
- Wetland destruction and river ecosystem disruption
- Loss of biodiversity and ecosystem services

Where environmental risks are identified, ACEECA shall apply mitigation measures or redesign interventions to eliminate or minimize harm.

3.2 Climate Change Mitigation and Carbon Reduction

The organization shall contribute to global and national climate goals by:

- Reducing greenhouse gas emissions across all operations
- Promoting renewable energy adoption and energy efficiency
- Minimizing travel-related emissions through digital solutions where possible
- Supporting low-carbon development pathways in community interventions

3.3 Climate Resilience and Adaptation

ACEECA shall enhance the ability of communities and ecosystems to withstand climate-related shocks by:

- Supporting climate-smart agriculture and sustainable land management
- Promoting ecosystem restoration (forests, riparian zones, degraded lands)
- Strengthening early warning systems and climate information access
- Building adaptive capacity in vulnerable populations

3.4 Protection of Community Health, Safety, and Livelihoods

All ACEECA interventions shall prioritize the safety and well-being of communities by ensuring that:

- Projects do not expose communities to environmental health risk

- Natural resource use does not compromise food security or water access
- Infrastructure and field activities meet safety standards
- Livelihood systems are protected and enhanced rather than disrupted

3.5 Conflict Sensitivity and Harm Prevention

ACEECA recognizes that environmental resources are often linked to conflict dynamics. Therefore, the organization shall:

- Avoid interventions that intensify competition over natural resources
- Conduct context analysis to identify potential conflict drivers
- Strengthen social cohesion and community collaboration
- Ensure equitable resource distribution and participation

3.6 Equity, Inclusion, and Environmental Justice

The organization shall promote fairness and inclusivity in environmental governance by:

- Ensuring meaningful participation of women, youth, and marginalized groups
- Addressing structural inequalities in access to natural resources
- Preventing discrimination in project targeting and benefit distribution
- Promoting environmental justice and rights-based approaches

3.7 Equitable Access to Environmental Benefits

ACEECA shall ensure that benefits derived from environmental interventions are fairly distributed by:

- Promoting community ownership of natural resource initiatives

- Ensuring transparency in selection of beneficiaries
- Supporting inclusive decision-making structures at community level
- Enhancing access to clean energy, water, and ecosystem services

3.8 Climate Justice and Inclusion

The organization shall integrate climate justice principles by ensuring that:

- Those most affected by climate change are prioritized in interventions
- Historical inequalities in resource access are acknowledged and addressed
- Climate adaptation and mitigation benefits are not concentrated among elites
- Vulnerable populations are empowered to participate in climate governance

4.0 CORE PRINCIPLES

The following core principles shall form the ethical, operational, and environmental foundation of all programmes and interventions implemented by ACEECA. These principles are mandatory and guide decision-making at all levels of the organization.

4.1 Do No Harm Principle

ACEECA is committed to ensuring that all interventions—whether programmatic, advocacy-based, research-oriented, or operational—do not cause or exacerbate harm to people, ecosystems, or social systems.

This principle requires that the organization:

- Systematically assesses potential negative impacts before implementation
- Identifies existing vulnerabilities within target communities
- Ensures that interventions do not deepen inequality, exclusion, or

resource-based tensions

- Avoids unintended environmental consequences such as pollution, habitat destruction, or resource depletion

In practice, Do No Harm is not limited to avoiding direct damage but includes preventing indirect and long-term adverse outcomes arising from ACEECA's presence or activities.

4.2 Environmental Sustainability

ACEECA shall integrate environmental sustainability into all aspects of its work to ensure long-term ecological integrity and resource availability for future generations.

This principle requires that the organization:

- Promotes responsible use and conservation of natural resources
- Supports restoration and regeneration of degraded ecosystems
- Encourages sustainable land, water, and energy management practices
- Ensures that all interventions are environmentally compatible and ecologically balanced

Sustainability is treated as a core design requirement, not an optional consideration, across all programmes.

4.3 Precautionary Principle

Where there is uncertainty regarding potential environmental or social impacts, ACEECA shall adopt a precautionary and risk-averse approach.

This means that:

- Lack of full scientific certainty shall not be used as a reason to delay preventive action
- Projects with potential significant environmental risks will undergo enhanced screening
- Activities with irreversible environmental damage potential shall be avoided unless adequately mitigated

- Adaptive management approaches will be applied where risks evolve over time

This principle ensures that environmental protection is prioritized even in contexts of limited data or complexity.

4.4 Climate Responsibility

ACEECA recognizes climate change as a central development and environmental challenge. All activities must therefore align with climate mitigation and adaptation objectives.

This includes:

- Reducing greenhouse gas emissions across all operations
- Prioritizing renewable energy and energy-efficient solutions
- Supporting community-level climate adaptation strategies
- Aligning all interventions with Kenya's national climate commitments and global frameworks such as the Paris Agreement

Climate responsibility is embedded in both operational decisions and programmatic design.

4.5 Equity and Inclusion

ACEECA is committed to ensuring that environmental and climate interventions are inclusive, equitable, and socially just.

The organization shall:

- Ensure meaningful participation of women, youth, persons with disabilities, and marginalized populations
- Address structural inequalities in access to natural resources and climate adaptation support
- Promote inclusive decision-making in environmental governance structures
- Prevent discrimination in project targeting, employment, and benefit distribution

Equity is treated as a measurable outcome, not just a guiding value.

4.6 Accountability and Transparency

ACEECA shall uphold the highest standards of accountability and transparency in all environmental decision-making processes.

This includes:

- Documenting all environmental risk assessments and mitigation decisions
- Ensuring stakeholder access to relevant environmental information
- Maintaining clear records of compliance with this policy
- Allowing independent review of environmental performance where required

Transparency strengthens trust with communities, donors, and institutional partners.

5.0 SCOPE OF APPLICATION

This policy applies universally across all operations of the African Centre for Environment, Energy and Climate Advocacy (ACEECA), without exception.

It is binding on:

5.1 Internal Personnel

- Board members and executive leadership
- Full-time and part-time staff
- Field officers and technical teams

5.2 External Collaborators

- Consultants and independent experts
- Volunteers and interns
- Research associates and fellows

5.3 Institutional Partners

- Implementing partners and consortium members
- Subcontractors and service providers

- Community-based organizations working with ACEECA

5.4 Programmatic and Operational Areas

The policy applies to:

- Donor-funded and grant-funded projects
- Community-level interventions and field activities
- Advocacy campaigns and public engagement
- Research, monitoring, and evaluation activities
- Procurement, logistics, and supply chain systems
- Infrastructure development and rehabilitation works

5.5 Compliance Expectation

All parties engaged with ACEECA are required to comply with this policy as a minimum standard. Non-compliance may result in corrective action, suspension of activities, or termination of partnerships.

6.0 ENVIRONMENTAL SAFEGUARDS

ACEECA shall implement a structured environmental safeguard system to ensure that all interventions are risk-informed, environmentally sound, and socially responsible.

6.1 Environmental Risk Screening

All projects, programmes, and activities shall undergo mandatory environmental and social risk screening prior to approval.

The screening process shall assess:

- **Environmental Impact Assessment (EIA) requirements**, where applicable under national law
- **Climate risk exposure**, including vulnerability to droughts, floods, and extreme weather

- **Community vulnerability analysis**, focusing on socio-economic and ecological sensitivity
- **Conflict sensitivity analysis**, particularly where natural resources may be contested

Outcome of Screening

Each project will be classified into risk categories (low, moderate, high), with corresponding mitigation requirements before implementation approval.

6.2 Biodiversity Protection

ACEECA is committed to safeguarding biodiversity and ecosystem integrity in all operational areas.

The organization shall:

- Avoid any activities that contribute to deforestation, habitat destruction, or wetland degradation
- Protect rivers, riparian zones, forests, and wildlife ecosystems from degradation
- Support ecosystem restoration initiatives, including reforestation and land rehabilitation
- Promote indigenous tree species and biodiversity-friendly land use practices
- Encourage agroecological approaches that enhance ecosystem resilience

Biodiversity protection shall be integrated into all land-based interventions.

6.3 Waste Management

ACEECA shall implement responsible and environmentally sound waste management practices across all operations.

This includes:

Waste Reduction

- Minimizing waste generation at source
- Promoting digital documentation to reduce paper use

- Encouraging reusable materials in field operations

Reuse and Recycling

- Implementing the Reduce, Reuse, Recycle (3Rs) hierarchy
- Partnering with local recycling systems where available

Safe Disposal

- Ensuring safe disposal of hazardous and non-hazardous waste
- Prohibiting open dumping or environmentally unsafe disposal practices
- Compliance with national environmental regulations

Plastic Reduction

- Reducing single-use plastics in field activities and offices
- Promoting eco-friendly alternatives during events and trainings

6.4 Water Resource Protection

ACEECA recognizes water as a critical ecological and community resource and shall ensure its protection through the following measures:

- Protection of water catchment areas and recharge zones
- Prevention of contamination of rivers, lakes, boreholes, and groundwater sources
- Promotion of water conservation practices in all project activities
- Encouragement of efficient water use technologies in community interventions
- Integration of watershed management principles into environmental programming

Water interventions shall be designed to enhance long-term availability and quality of

water resources.

6.5 Energy Use and Emissions

ACEECA shall actively reduce its energy footprint and transition toward low-carbon operations.

Key commitments include:

- Promotion of renewable energy technologies such as solar and clean cooking solutions
- Energy-efficient practices in offices, field operations, and infrastructure
- Reduction of travel-related emissions through virtual meetings and digital engagement
- Preference for low-emission transport options where feasible
- Monitoring and reporting of carbon emissions where data systems allow

The organization shall progressively develop systems for carbon accounting and emissions tracking as part of its MERL framework.

7.0 DO NO HARM FRAMEWORK

ACEECA adopts a structured and systematic Do No Harm (DNH) framework to ensure that all programmes, projects, advocacy initiatives, research activities, and institutional operations are designed and implemented in a manner that avoids causing unintended negative consequences to individuals, communities, ecosystems, institutions, and social systems.

The Do No Harm framework is rooted in the conflict-sensitive methodology developed by Mary B. Anderson and adapted to address environmental, climate, social, and governance dimensions of ACEECA's work.

The framework recognizes that well-intentioned interventions can inadvertently:

- Intensify social tensions and conflict;
- Exacerbate inequalities and exclusion;

- Increase pressure on natural resources;
- Disrupt local livelihoods and governance systems;
- Undermine ecosystem integrity; or
- Create dependency or unintended environmental consequences.

To prevent such outcomes, ACEECA shall apply the following four interrelated components.

7.1 Understanding Context

Before initiating any intervention, ACEECA shall conduct a comprehensive contextual analysis to understand the environmental, social, economic, political, and institutional realities of the target area.

The analysis shall include, but not be limited to:

Social Dynamics

Assessment of demographic composition, social hierarchies, gender relations, cultural norms, and community power structures.

Political Economy

Review of governance systems, stakeholder interests, decision-making processes, and distribution of resources and influence.

Environmental Stressors

Identification of climate risks, ecosystem degradation, biodiversity loss, water scarcity, land degradation, and other ecological pressures.

Resource Competition

Assessment of existing or potential disputes over land, water, forests, grazing areas, and energy resources.

Conflict Sensitivity

Analysis of historical and emerging tensions, grievances, and factors that may affect project implementation or outcomes.

The contextual analysis shall be documented and updated periodically, particularly in areas affected by environmental stress, rapid socio-

economic change, or conflict.

7.2 Analyzing Dividers and Connectors

ACEECA shall systematically identify the factors that divide communities and those that promote cooperation and social cohesion.

Dividers

Dividers are factors that may contribute to tension, exclusion, or conflict, including:

- Unequal access to resources;
- Historical grievances;
- Political polarization;
- Discrimination and marginalization;
- Competition over land, water, and energy resources; and
- Perceived favoritism in project benefits.

Connectors

Connectors are institutions, relationships, and shared values that strengthen collaboration and peace, including:

- Community leadership structures;
- Traditional dispute-resolution mechanisms;
- Shared environmental interests;
- Cooperative groups and associations; and
- Cultural norms promoting solidarity.

ACEECA shall design interventions to minimize the influence of dividers and reinforce connectors that enhance social cohesion and collective environmental stewardship.

7.3 Assessing Project Impact Pathways

Each intervention shall undergo an assessment of potential impact pathways to determine both intended and unintended effects.

The assessment shall consider:

Who Benefits

Identification of direct and indirect beneficiaries and the expected distribution of project benefits.

Who May Be Excluded

Analysis of groups that may be unintentionally marginalized due to social, geographic, economic, or cultural barriers.

Potential Unintended Consequences

Consideration of possible adverse outcomes such as elite capture, increased conflict, environmental degradation, or dependency.

Long-Term Environmental Effects

Assessment of cumulative impacts on ecosystems, biodiversity, water resources, soil quality, and greenhouse gas emissions.

This analysis shall inform project design, targeting strategies, and safeguard measures.

7.4 Risk Mitigation Measures

For every identified environmental or social risk, ACEECA shall develop and implement appropriate mitigation measures before activities commence.

Mitigation measures may include:

- Redesigning project activities;
- Adjusting beneficiary selection criteria;
- Enhancing stakeholder consultation;
- Establishing grievance and feedback mechanisms;
- Providing targeted inclusion strategies;
- Introducing environmental controls; and
- Monitoring high-risk issues throughout implementation.

Mitigation measures shall be documented in project work plans and monitored through the ACEECA MERL framework.

8.0 COMMUNITY SAFEGUARDING

ACEECA recognizes communities as rights holders and essential partners in sustainable development. All interventions shall uphold community dignity, rights, autonomy, and

livelihoods.

8.1 Free, Prior and Informed Participation

ACEECA shall apply the principles of Free, Prior and Informed Consent (FPIC), particularly when working with indigenous peoples, local communities, and customary resource users.

This requires that communities:

- Participate voluntarily and without coercion;
- Receive timely and understandable information;
- Are consulted before decisions are made; and
- Have the opportunity to influence project design and implementation.

8.2 Respect for Indigenous and Local Knowledge

ACEECA shall recognize and value indigenous and traditional knowledge systems as critical sources of environmental and climate solutions.

The organization shall:

- Integrate local knowledge into project planning;
- Protect community intellectual contributions;
- Promote culturally appropriate interventions; and
- Ensure that traditional practices are respected where consistent with human rights and environmental sustainability.

8.3 Inclusive Participation in Decision-Making

All stakeholders, including women, youth, persons with disabilities, and marginalized groups, shall have equitable opportunities to participate in consultations, planning, implementation, and monitoring.

Participation shall be:

- Accessible;

- Meaningful;
- Representative; and
- Documented.

8.4 Protection of Community Rights and Livelihoods

ACEECA shall ensure that interventions do not undermine:

- Land and resource use rights;
- Livelihood systems;
- Food and water security;
- Cultural identity; or
- Social cohesion.

Where risks to livelihoods are identified, appropriate safeguards and compensatory measures shall be developed.

8.5 Prohibition of Forced Displacement and Resource Deprivation

ACEECA shall not support or implement any activity that results in involuntary displacement, denial of lawful access to natural resources, or dispossession of communities.

Any land- or resource-related intervention must be based on voluntary participation, transparent consultation, and documented community agreement.

9.0 CLIMATE CHANGE CONSIDERATIONS

Climate change considerations shall be integrated into all ACEECA programmes and institutional operations to ensure that interventions are both climate-responsive and climate-resilient.

9.1 Alignment with National and Global Climate Frameworks

All interventions shall align with:

- Kenya's Nationally Determined Contributions (NDCs);
- National Climate Change Action Plans;
- County climate policies;

- The Paris Agreement; and
- Relevant international environmental commitments.

9.2 Promotion of Climate Adaptation

ACEECA shall prioritize interventions that strengthen the adaptive capacity of vulnerable communities and ecosystems through:

- Climate-smart agriculture;
- Water conservation and watershed management;
- Ecosystem restoration;
- Diversified livelihoods;
- Early warning systems; and
- Community climate education.

9.3 Greenhouse Gas Emissions Reduction

Where feasible, ACEECA shall reduce emissions by:

- Promoting renewable energy technologies;
- Supporting energy efficiency;
- Reducing waste;
- Encouraging sustainable transport; and
- Minimizing carbon-intensive practices.

9.4 Climate Resilience Across Sectors

Climate resilience shall be integrated into all sectoral interventions, including:

- Agriculture and food systems;
- Water and sanitation;
- Renewable energy;
- Natural resource management;
- Community governance; and
- Policy advocacy.

9.5 Avoidance of Maladaptation

ACEECA shall ensure that adaptation measures do not create new vulnerabilities, increase inequality, or shift risks to other populations or ecosystems.

All climate interventions shall therefore be screened for potential maladaptation and unintended consequences before implementation.

10.0 PROCUREMENT AND PARTNERSHIPS

ACEECA recognizes that its environmental footprint and safeguarding obligations extend beyond its internal operations to include suppliers, contractors, consultants, and implementing partners. Procurement and partnership decisions shall therefore reflect the organization's commitment to environmental sustainability, ethical conduct, and the Do No Harm principle.

All procurement and partnership arrangements shall incorporate environmental and social considerations throughout the selection, contracting, implementation, and performance review processes.

10.1 Sustainable Procurement Principles

ACEECA shall adopt a sustainable procurement approach that seeks to minimize negative environmental impacts and maximize social and economic value.

The organization shall:

- Procure goods and services that are environmentally responsible, durable, energy-efficient, and resource-efficient;
- Prioritize products with reduced packaging, recycled content, or recognized eco-certifications where available;
- Consider the full life-cycle environmental cost of products, including production, transportation, use, and disposal;
- Support local and regional suppliers where this reduces emissions and strengthens sustainable livelihoods; and
- Avoid products or services associated with significant environmental harm or

unsustainable resource extraction.

10.2 Supplier Environmental Compliance

All suppliers, contractors, and service providers shall be expected to comply with applicable environmental laws, occupational health and safety requirements, and relevant sustainability standards.

Where appropriate, ACEECA may require suppliers to demonstrate:

- Compliance with national environmental regulations;
- Existence of waste management and pollution prevention practices;
- Responsible sourcing of raw materials;
- Use of environmentally sound technologies; and
- Commitment to ethical labor and business practices.

Failure to meet minimum environmental standards may result in disqualification or termination of contractual relationships.

10.3 Preference for Eco-Friendly Goods and Services

During procurement decisions, ACEECA shall give preference to environmentally preferable alternatives, including:

- Renewable energy technologies and equipment;
- Recyclable and reusable materials;
- Energy-efficient appliances;
- Low-emission transportation options;
- Sustainable office supplies; and
- Environmentally responsible event and catering services.

Cost shall be considered alongside environmental performance and long-term sustainability value.

10.4 Partnership Due Diligence

Before entering into formal partnerships, ACEECA shall assess the environmental and

social practices of prospective partners to ensure alignment with organizational values and safeguarding requirements.

The due diligence process may examine:

- Institutional policies and governance systems;
- Past environmental and social performance;
- Safeguarding and compliance mechanisms;
- Reputational risks; and
- Capacity to implement this policy effectively.

Partnerships presenting unacceptable environmental or ethical risks shall not be approved.

10.5 Contractual Obligations

All partnership agreements, consultancy contracts, and procurement contracts shall, where relevant, include clauses requiring compliance with this Environmental and Do No Harm Policy.

Such clauses may address:

- Environmental safeguard obligations;
- Incident reporting requirements;
- Access for monitoring and audits;
- Corrective action responsibilities; and
- Remedies for non-compliance.

Compliance with this policy shall be a condition of continued engagement with ACEECA.

10.6 Environmental Criteria in Vendor Evaluation

Environmental and social performance shall form part of vendor prequalification and performance assessment.

Evaluation criteria may include:

- Environmental certifications and standards;

- Waste reduction measures;
- Carbon management practices;
- Responsible sourcing policies; and
- History of regulatory compliance.

These criteria shall be proportionate to the size, complexity, and risk profile of the procurement.

11.0 MONITORING, EVALUATION AND LEARNING (MEL)

ACEECA shall integrate environmental and Do No Harm considerations into its Monitoring, Evaluation, Research, and Learning (MERL) framework to ensure that safeguarding commitments are systematically measured, reviewed, and improved.

This approach ensures that environmental performance is treated as a core component of program quality, accountability, and donor reporting.

11.1 Monitoring Environmental and Social Impacts

All projects and operations shall monitor environmental and social impacts throughout implementation.

Monitoring activities shall include:

- Tracking compliance with environmental mitigation measures;
- Measuring key environmental and DNH indicators;
- Reviewing incident and grievance data;
- Assessing inclusion and equity outcomes; and
- Verifying implementation of corrective actions.

Monitoring findings shall be integrated into routine project reporting.

11.2 Environmental Audits and Compliance Reviews

ACEECA shall conduct periodic internal or external environmental audits and safeguard reviews, particularly for moderate- and high-risk interventions.

These reviews shall assess:

- Compliance with this policy;
- Effectiveness of mitigation measures;
- Emerging environmental and social risks; and
- Opportunities for improvement.

Audit findings shall be documented and addressed through management action plans.

11.3 Evaluation of Environmental Outcomes

Project evaluations shall examine both intended and unintended environmental and social outcomes, including:

- Ecosystem restoration and conservation results;
- Community resilience improvements;
- Conflict sensitivity and social cohesion effects;
- Carbon reduction and energy efficiency gains; and
- Sustainability of interventions after project completion.

Environmental performance shall be included in baseline, midline, and endline assessments where relevant.

11.4 Learning and Knowledge Management

ACEECA shall document and disseminate lessons learned, innovations, and best practices related to environmental safeguarding and Do No Harm implementation.

Learning products may include:

- Case studies;
- After-action reviews;
- Technical briefs;
- Policy papers; and
- Community stories of change.

Lessons learned shall inform future programming and strategic decision-making.

11.5 Community Feedback and Adaptive Management

Community perspectives are essential to understanding project impacts and unintended consequences.

ACEECA shall:

- Establish accessible feedback and grievance mechanisms;
- Integrate stakeholder input into monitoring systems;
- Respond to concerns in a timely and transparent manner; and
- Adjust programme strategies based on evidence and community feedback.

This adaptive management approach strengthens accountability and continuous improvement.

12.0 ROLES AND RESPONSIBILITIES

Implementation of this policy is a shared responsibility across the governance, management, and operational structures of African Centre for Environment, Energy and Climate Advocacy (ACEECA).

All individuals and entities working with ACEECA are expected to understand and fulfill their respective responsibilities.

12.1 Board of Directors

The Board of Directors provides overall governance and strategic oversight for environmental and Do No Harm performance.

The Board shall:

- Approve this policy and subsequent revisions;
- Provide strategic direction on sustainability and safeguarding;
- Monitor organizational compliance and risk exposure;

- Review significant environmental incidents and management responses; and
- Ensure that environmental stewardship remains integral to ACEECA's mission and governance.

12.2 Executive Leadership

The Chief Executive Officer and senior leadership are responsible for institutional implementation of this policy.

They shall:

- Champion a culture of environmental responsibility;
- Ensure integration of the policy into organizational systems;
- Allocate adequate financial, technical, and human resources;
- Approve high-risk mitigation measures and corrective actions; and
- Report to the Board on policy performance.

12.3 Head of Programmes

The Head of Programmes is responsible for operational integration of environmental and DNH safeguards across the project cycle.

Responsibilities include:

- Ensuring environmental screening of all projects;
- Supervising implementation of mitigation measures;
- Integrating safeguards into work plans and budgets;
- Coordinating with MERL teams on monitoring indicators; and
- Ensuring timely response to environmental and community concerns.

12.4 Head of Communications

The Head of Communications shall ensure that all external and internal communications

accurately reflect ACEECA's environmental commitments.

Responsibilities include:

- Promoting responsible and evidence-based environmental messaging;
- Preventing exaggeration or misleading sustainability claims (greenwashing);
- Communicating lessons learned and impact stories ethically;
- Supporting public accountability and stakeholder engagement; and
- Ensuring informed consent for community images and testimonials.

12.5 Finance and Procurement Personnel

Finance and procurement staff shall:

- Integrate environmental criteria into procurement systems;
- Verify supplier compliance with contractual obligations;
- Maintain records of sustainable procurement decisions; and
- Support budgeting for mitigation and monitoring activities.

12.6 MERL Personnel

Monitoring, Evaluation, Research, and Learning personnel shall:

- Develop and track environmental and DNH indicators;
- Conduct compliance reviews and data verification;
- Analyze trends and lessons learned; and
- Support evidence-based adaptation and reporting.

12.7 All Staff, Consultants, Volunteers and Interns

All personnel engaged by ACEECA shall:

- Comply with this policy and related procedures;
- Participate in required training;

- Apply Do No Harm principles in their work;
- Report environmental risks, incidents, and violations; and
- Cooperate with monitoring, audits, and investigations.

12.8 Implementing Partners and Contractors

External partners and contractors shall:

- Adhere to this policy and contractual safeguard obligations;
- Conduct activities in an environmentally and socially responsible manner;
- Report incidents and grievances promptly; and
- Implement corrective actions where necessary.

13.0 INCIDENT REPORTING AND RESPONSE

ACEECA is committed to ensuring that any actual or suspected environmental harm, community grievance, or safeguarding violation is identified, reported, investigated, and addressed promptly and effectively.

A robust incident reporting and response mechanism shall be maintained to promote accountability, minimize harm, restore affected environments or communities, and prevent recurrence.

13.1 Types of Reportable Incidents

The reporting mechanism shall apply to all incidents, complaints, and concerns related to ACEECA programmes, partnerships, and operations, including but not limited to:

Environmental Harm Incidents

- Pollution of land, water, or air;
- Destruction of habitats or biodiversity;
- Improper waste disposal;
- Soil erosion or sedimentation caused by

project activities;

- Overuse or contamination of natural resources;
- Unanticipated greenhouse gas emissions or environmental degradation.

Community Grievances

- Complaints regarding exclusion from project benefits;
- Concerns over adverse livelihood impacts;
- Disputes related to land, water, or natural resource use;
- Objections to consultation or consent processes;
- Allegations of unfair treatment or lack of transparency.

Safeguarding Violations

- Breaches of this Environmental and Do No Harm Policy;
- Non-compliance with mitigation measures;
- Misrepresentation of environmental claims;
- Retaliation against complainants or whistleblowers;
- Failure to implement required corrective actions.

13.2 Reporting Channels

Incidents may be reported through any accessible and confidential channel, including:

- Direct reporting to supervisors or project managers;
- Dedicated email addresses or telephone contacts;
- Community meetings and feedback forums;
- Suggestion boxes or digital reporting systems;

- Existing grievance redress mechanisms.

Reports may be submitted by staff, partners, contractors, community members, beneficiaries, or other stakeholders.

Anonymous reporting shall be permitted where appropriate.

13.3 Immediate Reporting Requirement

All personnel and partners are required to report actual or suspected incidents as soon as reasonably possible and, where feasible, within twenty-four (24) hours of becoming aware of the issue.

Serious incidents involving significant environmental damage, threats to health and safety, or major community conflict shall be escalated immediately to senior management.

13.4 Incident Classification

Reported incidents shall be classified according to severity and urgency, for example:

- **Low Risk:** Minor issues with limited and easily reversible impacts;
- **Moderate Risk:** Incidents requiring formal investigation and management attention;
- **High Risk:** Significant incidents involving major environmental damage, substantial community harm, or serious compliance concerns.

The classification shall guide response timelines and management oversight.

13.5 Investigation Process

All reported incidents shall be reviewed and investigated within defined timelines proportionate to the severity of the issue.

The investigation process shall include:

1. Registration and acknowledgment of the report;
2. Preliminary assessment and risk classification;
3. Fact-finding and evidence collection;

4. Consultation with affected stakeholders where appropriate;
5. Determination of root causes and responsibility; and
6. Development of recommendations and corrective actions.

Investigations shall be impartial, documented, and conducted with due regard for confidentiality and fairness.

13.6 Corrective Action Plans

Where an incident is substantiated, ACEECA shall develop and implement a corrective action plan that may include:

- Immediate containment and mitigation measures;
- Environmental restoration or remediation;
- Community engagement and dispute resolution;
- Process improvements and additional controls;
- Staff or partner training;
- Contractual or disciplinary measures.

Implementation of corrective actions shall be monitored until closure.

13.7 Protection Against Retaliation

ACEECA shall not tolerate retaliation against any individual who reports a concern in good faith.

All reports shall be treated respectfully and confidentially to the extent possible, and complainants shall be protected from intimidation, discrimination, or adverse treatment.

13.8 Documentation and Reporting

All incidents, investigations, actions, and outcomes shall be recorded and maintained in an incident register.

Significant incidents and trends shall be reported to executive leadership and, where

required, to the Board, donors, regulatory authorities, and affected stakeholders.

Lessons learned shall inform organizational improvements.

14.0 CAPACITY BUILDING

ACEECA recognizes that effective implementation of this policy depends on strong institutional and individual capacity. The organization shall therefore invest in continuous learning and professional development.

14.1 Training and Orientation

All staff, consultants, volunteers, and relevant partners shall receive orientation and periodic training on:

- Environmental safeguards and sustainability principles;
- Do No Harm and conflict sensitivity;
- Climate risk assessment and adaptation;
- Community engagement and safeguarding;
- Incident reporting and grievance handling;
- Sustainable procurement and responsible operations.

Training shall be integrated into onboarding and annual development plans.

14.2 Specialized Technical Capacity

ACEECA shall build internal expertise in areas such as:

- Environmental and social risk screening;
- Ecosystem restoration and biodiversity conservation;
- Carbon accounting and emissions management;
- Climate resilience programming;
- Monitoring and evaluation of safeguard performance.

External experts may be engaged where

specialized knowledge is required.

14.3 Partner Capacity Strengthening

Where necessary, ACEECA shall support implementing partners and community organizations to understand and apply this policy through mentoring, technical assistance, and shared learning.

14.4 Knowledge Sharing and Continuous Learning

The organization shall foster a culture of learning by:

- Conducting after-action reviews;
- Sharing lessons learned and best practices;
- Participating in professional networks;
- Updating guidance tools and templates.

Capacity building shall be treated as an ongoing organizational investment rather than a one-time activity.

15.0 COMPLIANCE AND ENFORCEMENT

Compliance with this policy is mandatory for all personnel and entities acting on behalf of ACEECA.

Failure to comply may result in administrative, contractual, or legal consequences proportionate to the nature and severity of the breach.

15.1 Compliance Monitoring

ACEECA shall monitor compliance through:

- Routine project supervision;
- MERL reviews and audits;
- Procurement and partnership assessments;
- Incident investigations; and
- Management reporting.

15.2 Corrective Measures

Where non-compliance is identified, ACEECA may require:

- Immediate remedial actions;
- Additional training or supervision;
- Suspension of high-risk activities;
- Strengthened monitoring arrangements.

15.3 Disciplinary and Contractual Actions

Depending on the circumstances, enforcement actions may include:

For Staff and Personnel

- Verbal or written warnings;
- Performance improvement measures;
- Suspension;
- Disciplinary action under human resource policies;
- Termination of employment or engagement.

For Partners, Vendors, and Contractors

- Corrective action notices;
- Withholding of payments;
- Suspension of activities;
- Withdrawal of partnership agreements;
- Contract termination;
- Exclusion from future engagements.

15.4 Reporting to External Authorities

Where required by law, regulation, or donor agreements, ACEECA may report serious breaches to relevant government agencies, donors, or other competent authorities.

16.0 POLICY REVIEW

This policy shall be reviewed at least once every three (3) years to ensure continued relevance, effectiveness, and alignment with evolving legal, environmental, and organizational requirements.

16.1 Circumstances Triggering an Earlier Review

An earlier review may be initiated where:

- Significant changes occur in national or international laws and standards;
- New environmental or social risks emerge;
- Major incidents reveal gaps in the policy;
- Donor requirements change;
- ACEECA's strategic direction, structure, or operational scope evolves.

16.2 Review Process

The review process shall include:

- Assessment of implementation experience and performance data;
- Consultation with staff, partners, and stakeholders;
- Consideration of audit findings and lessons learned;
- Benchmarking against international best practices.

Recommended revisions shall be submitted to the Board of Directors for approval.

16.3 Communication and Re-Orientation

Following approval of revisions, ACEECA shall:

- Communicate the updated policy to all relevant stakeholders;
- Update associated procedures and tools; and
- Provide orientation or refresher training as necessary.

16.4 Continuous Improvement Commitment

Policy review is part of ACEECA's commitment to adaptive management and continuous improvement. The organization shall use evidence, stakeholder feedback, and lessons learned to strengthen its environmental stewardship and Do No Harm performance over time.

17.0 ALIGNMENT WITH ACEECA MERL FRAMEWORK AND THEORY OF CHANGE

This section integrates the Environmental and Do No Harm (DNH) Policy into the institutional Monitoring, Evaluation, Research, and Learning (MERL) framework and the Theory of Change (ToC) of the African Centre for Environment, Energy and Climate Advocacy (ACEECA). Its purpose is to ensure that environmental stewardship, climate responsibility, and harm prevention are embedded in ACEECA's results architecture rather than treated as stand-alone compliance obligations.

By integrating this policy into the organizational ToC and MERL system, ACEECA demonstrates that environmental and social safeguards are:

- Strategically linked to organizational impact pathways;
- Operationalized through project design and implementation procedures;
- Measured using robust donor-grade indicators;
- Verified through evidence-based monitoring and evaluation systems;
- Strengthened through research and institutional learning; and
- Used to inform adaptive management and continuous improvement.

This integration aligns with results-based management approaches used by the United Nations Development Programme, United Nations Environment Programme, the World Bank, the Green Climate Fund, and other development partners.

17.1 LINK TO ACEECA THEORY OF CHANGE

ACEECA's Theory of Change is founded on the following core assumption:

“If communities are empowered with knowledge, resources, institutions, and partnerships for climate action, environmental protection, and clean energy adoption, then they will build resilient, low-carbon, and sustainable livelihoods while strengthening ecosystem integrity and climate justice.”

The Environmental and Do No Harm Policy operationalizes this theory by ensuring that every stage of the results chain incorporates safeguards that protect people, ecosystems, and institutions.

17.1.1 Inputs (Resources and Capacities)

At the input level, ACEECA shall allocate and mobilize the institutional capacities required to implement environmental and DNH commitments.

These include:

- Staff and partners trained in environmental and social safeguards;
- Environmental screening tools and risk assessment methodologies;
- Conflict sensitivity and stakeholder engagement frameworks;
- Budgets for mitigation, monitoring, restoration, and capacity building;
- Partnerships aligned with environmental and ethical standards;
- Data systems for tracking environmental and social performance.

These inputs ensure that safeguarding is built into project preparation and resource allocation from the outset.

17.1.2 Activities

Environmental and DNH safeguards are integrated into all core activities, including:

- Community training on climate resilience and environmental stewardship;
- Ecosystem restoration and biodiversity conservation initiatives;
- Renewable energy deployment and energy-efficiency programmes;
- Climate-smart agriculture and sustainable land management;
- Advocacy for environmental governance and climate justice;
- Research and policy analysis.

All activities must successfully complete environmental and DNH screening before implementation and include mitigation measures where risks are identified.

17.1.3 Outputs

Safeguarded activities produce measurable outputs such as:

- Communities trained in sustainable practices;
- Hectares of ecosystems restored;
- Renewable energy systems installed;
- Policy dialogues and advocacy campaigns conducted;
- Environmental assessments and mitigation plans completed.

Output data shall be disaggregated, where relevant, by:

- Sex and gender;
- Age group;
- Disability status;
- Geographic location;
- Vulnerability category; and
- Environmental risk classification.

This disaggregation supports equity analysis and donor reporting.

17.1.4 Outcomes

The policy contributes to outcomes including:

- Reduced environmental degradation;
- Increased adoption of sustainable practices;
- Improved climate resilience;
- Reduced conflict over natural resources;
- More inclusive environmental governance;
- Enhanced institutional accountability.

Outcome monitoring shall incorporate explicit Do No Harm indicators to verify that positive results are achieved without unintended adverse consequences.

17.1.5 Impact

At the impact level, the policy contributes to ACEECA's long-term vision of:

- Climate-resilient and environmentally sustainable communities;
- Reduced vulnerability to climate change;
- Equitable access to environmental and energy resources;
- Healthy ecosystems and conserved biodiversity;
- Stronger climate governance and environmental justice.

17.2 MERL SYSTEM INTEGRATION

Environmental and Do No Harm safeguards are embedded across all components of ACEECA's Monitoring, Evaluation, Research, and Learning system.

This ensures that safeguards are systematically planned, tracked, assessed, and improved over time.

17.2.1 Monitoring (M)

Monitoring systems shall continuously track compliance with this policy and the

environmental and social performance of all projects.

Key monitoring indicators may include:

- Percentage of projects completing environmental and DNH screening before approval;
- Number of environmental and social risks identified and mitigated;
- Number and severity of reported incidents and grievances;
- Inclusion rates of women, youth, persons with disabilities, and marginalized groups;
- Area of land, wetlands, or riparian ecosystems restored;
- Number of trees planted and survival rates;
- Carbon emissions associated with operations, where measurable.

Monitoring data shall be integrated into project dashboards and management reports.

17.2.2 Evaluation (E)

Evaluations shall assess the relevance, effectiveness, efficiency, sustainability, and impact of environmental and DNH measures.

Specific evaluation questions shall examine:

- Environmental sustainability of interventions;
- Unintended positive and negative effects;
- Distribution of benefits among stakeholder groups;
- Long-term ecological and social outcomes;
- Compliance with donor and regulatory requirements.

Evaluations shall include a dedicated Environmental and DNH Compliance Scorecard where relevant.

17.2.3 Research (R)

Research functions shall generate evidence to improve environmental programming and policy influence.

Research may focus on:

- Emerging environmental and climate risks;
- Community vulnerability and resilience patterns;
- Natural resource conflict dynamics;
- Effectiveness of adaptation and mitigation strategies;
- Governance and policy gaps.

Research findings shall inform advocacy, programme design, and institutional learning.

17.2.4 Learning (L)

Learning systems shall capture and disseminate knowledge arising from implementation experience.

Key learning mechanisms include:

- After-action reviews;
- Reflection workshops;
- Community feedback analysis;
- Case studies and technical briefs;
- Policy briefs and knowledge products.

Lessons learned shall be incorporated into subsequent project cycles and policy updates.

17.3 ENVIRONMENTAL AND DNH INDICATORS FRAMEWORK

To meet donor reporting standards, ACEECA shall maintain a structured indicator framework comprising:

A. Process Indicators

- Percentage of projects screened for environmental and DNH risks;
- Percentage of staff trained in safeguards;
- Percentage of partners contractually compliant with this policy.

B. Output Indicators

- Number of environmental protection initiatives implemented;
- Number of people reached with climate resilience education;
- Area of land, wetlands, or riverbanks restored.

C. Outcome Indicators

- Reduction in environmental incidents and grievances;
- Increased adoption of sustainable practices;
- Improved community resilience scores.

D. Impact Indicators

- Improved ecosystem health indicators;
- Reduced climate vulnerability in target areas;
- Strengthened environmental governance and community stewardship.

17.4 DATA COLLECTION AND VERIFICATION SYSTEM

To ensure data integrity and credibility, ACEECA shall use robust data collection and verification methods, including:

- Baseline assessments with environmental risk mapping;
- Routine monitoring tools and field verification;
- Midline and endline evaluations;
- Community grievance and feedback mechanisms;
- Independent verification for high-risk projects;
- Geographic Information Systems (GIS), remote sensing, and photographic evidence where appropriate.

All data shall be managed in accordance with ACEECA's data governance and quality assurance procedures.

17.5 ACCOUNTABILITY AND LEARNING LOOP

ACEECA adopts a continuous improvement model based on the Plan–Do–Check–Act cycle.

Plan

Conduct environmental and DNH screening, define indicators, and allocate mitigation resources.

Do

Implement activities with safeguards embedded in work plans and operational procedures.

Check

Monitor compliance, review evidence, and evaluate outcomes.

Act

Adjust strategies, strengthen controls, and incorporate lessons learned.

This adaptive management approach is consistent with international results-based management practice.

17.6 DONOR ALIGNMENT STATEMENT

This policy and its integration into the MERL and Theory of Change frameworks are aligned with:

- United Nations Development Programme Results-Based Management framework;
- United Nations Environment Programme environmental safeguards;
- World Bank Environmental and Social Framework;
- Green Climate Fund Environmental and Social Safeguards;
- OECD-DAC evaluation criteria;
- International best practice in conflict-sensitive and environmentally sustainable development.

17.7 FINAL NOTE ON INSTITUTIONAL READINESS

Through this integration, ACEECA demonstrates to donors, partners, and stakeholders that environmental protection and Do No Harm are institutionalized as core management and accountability functions.

These principles are:

- Embedded in organizational strategy and Theory of Change;
- Operationalized through project design and implementation systems;
- Measured through rigorous MERL processes;
- Verified using credible data and evidence;
- Reported through internationally recognized indicators; and
- Strengthened through ongoing learning and adaptation.

This institutional architecture positions ACEECA as a credible, accountable, and donor-ready organization capable of implementing high-impact environmental, climate, and clean energy programmes to international standards.

