



FSD Stakeholder, Beneficiary and Social Management Policy

The Swiss Foundation for Mine Action (FSD)



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As a matter of principle, humanitarian and development projects have to ensure that their implementation does not cause any harm or bring about negative consequences for any of the stakeholders involved. This “do no harm” principle explicitly also applies for humanitarian mine action (HMA) programmes. As an HMA organisation, FSD is therefore keen to not only display professionalism and excellency in its mine action activities, but also actively seeks to protect the environment and the climate and to support social development among its beneficiaries and stakeholders.

In order to ensure that all of FSD’s programmes are implemented in a sustainable way, FSD has developed a Stakeholder, Beneficiary and Social Policy that defines management measures to avoid or mitigate potential negative impacts.

Guiding Principles

FSD is committed to provide its best efforts to avoid or mitigate adverse environmental, social and climate impacts in all of the projects it implements. FSD seeks to:

- Avoid, reduce or limit adverse cultural and social impacts and enhance community and social benefits from its programmes;
- Preserve and protect biodiversity and sustainably manage local resources;
- Avoid adverse impacts upon the living conditions and cultures of communities;
- Ensure and support health protection at work and the occupational health and safety of people working on FSD programmes;
- Condemn forced labour and child labour, ban discrimination¹ in respect of employment as well as occupation and support the freedom of association and the right to collective bargaining; and
- Protect and preserve national and local cultural heritage.

Key Documents

In order to ensure that FSD programmes are in full compliance with applicable national and international environment, social, health and safety regulations, this policy is specifically developed for project implementation and has been inspired by, and complies with, the regulations set forth in a number of key documents:

International Donor and Good Practice Guidelines:

- KfW Development Bank – Sustainability Guideline. Assessment of Environmental, Social, and Climate Performance: Principles and Process ([Feb, 2021](#))
- World Bank Group (WBG) – Environmental and Social Safeguards
- International Finance Corporation (IFC) – Environmental and Social Performance Standards (PS)

¹ Based on ethnic origin, nationality, age, sex, religion, disability or any other discrimination criteria.

- PATRIP Foundation – Environmental and Social Policy (Final Report v5.1).
- ALNAP Engagement of Crisis Affected People in Humanitarian Action².
- Humanitarian Practice Network – Humanitarian Accountability³
- The European Consensus on Humanitarian Aid⁴.
- Impact Measurement and Accountability in Emergencies – The Good Enough Guide⁵.

International Mine Action Guidelines: International Mine Action Standards (IMAS), describing best practice in mine action:

- IMAS 07.13 Environmental Management in Mine Action (First Edition)
- IMAS 08.40 Marking mine and ERW hazards (Second Edition)

FSD Policies and SOPs: [FSD institutional policies and](#) Standard Operating Procedures (SOP), describing how FSD conducts all of its mine action activities and manages all staff:

- FSD Code of Ethics.
- FSD Code of Conduct.
- FSD PSEA Policy.
- FSD Gender, Diversity and Inclusion Policy.
- FSD Environmental Policy.
- FSD Grievance Policy.
- FSD Whistle-blower Policy.
- [FSD Procurement Policy and Policy on Ethical Procurement.](#)
- [FSD Health and Safety Policy](#)

Due to its long experience in mine action and its adherence to all applicable international, national and internal standards on environmental protection as well as social aspects, FSD meets and exceeds many of the measures and practices outlined in the strategy and policies listed above. Further, FSD's internal guidelines are modelled on these good practice guidelines and papers, including the Sphere Standards⁶, International Mine Action Standards (IMAS) and national [mine action](#) standards in the countries where FSD works [and](#) are extremely comprehensive in controlling all aspects of health and safety and the approach to operations. In addition to this, all FSD clearance programmes include specific community liaison and engagement activities in [areas close to demining worksites and other](#) areas [where](#) FSD works.

All de-mining planning and execution activities are conducted under stringent operating standards that are regularly subject to both internal and external validation and all de-mining operators must be accredited and registered with national authorities before any organisation is allowed to operate.

² <https://reliefweb.int/sites/reliefweb.int/files/resources/background-paper-29th-meeting.pdf>

³ <https://odihpn.org/wp-content/uploads/2007/04/networkpaper058.pdf>

⁴ https://ec.europa.eu/echo/who/humanitarian-aid-and-civil-protection/european-consensus_en

⁵ <https://policy-practice.oxfam.org/resources/impact-measurement-and-accountability-in-emergencies-the-good-enough-guide-115510/>

⁶ <https://spherestandards.org>

FSD's mine action and other activities generally fall in two categories. Firstly, clearing land mines and other explosive remnants of war; and secondly, soft skill interventions, particularly in the field of explosive ordnance risk education (EORE), survey and community liaison. This also includes mine victim assistance activities.

In light of these categories and the activities they cover, FSD has developed mitigating measures and procedure in order to protect stakeholders, beneficiaries and local communities. The key processes are outlined below and cover both the project preparation and implementation stages.

Programme Preparation (Design, Planning)

- **Stakeholder Engagement:** Prior to project implementation, FSD commits to engage and communicate with communities and to plan sufficient time for their participation. FSD further commits to ensure regular consultations with the local authorities and communities regarding its mine action activities. A simple template "Stakeholder Engagement Plan" is shown at **Annex A** to this policy to record, control and monitor these actions.
- **Grievance Mechanism:** FSD documents all grievances from workers, communities and other stakeholders formulated on a register along with the responses given. Anonymity, if required, will be guaranteed. This is considered an extension of FSD's existing whistle-blower policy, which provides all FSD staff with a neutral and independent mechanism for such redress within FSD. This policy, in information on how community members, stakeholders and all FSD's partners can contact FSD in country and through its HQ are briefed in all projects to local community members and leaders. A simple "Grievance Form Template" is available at **Annex B** to this policy to distribute to community members and to record any complaints or issues.
- **Occupational Health & Safety:**
 - To ensure the highest standards of professionalism and full compliance with all regulations and guidelines set forth and referred to in this document, FSD will continue its commitment to conduct all project implementation on its own, through workers employed, trained and supervised by FSD. In the exceptional circumstance that an external organisation of any kind needs to be contracted for [implementation of](#) activities, FSD will ensure to solely contract specialized firms that are internationally recognized and act according to international good practices in mine action. Specifically, they also must have registration and accreditation with the national authority.
 - FSD [conducts annual refresher trainings for all staff members in its programmes on both technical and organisational levels. At this time, the relevant health and safety measures for clearing landmines and unexploded ordnance \(UXO\) are explained and rehearsed along with any programme specific activities and measures. At the same time refresher training is conducted on FSD's core policies, procedures and cross cutting topics such as gender equality, PSEA, environmental considerations, code of ethics and code of conduct.](#)
- **Community Health and Safety:** FSD commits to continue its efforts to include beneficiary communities of FSD's clearance operations in its risk education outreach. This is intended to ensure that community members are prepared for emergencies, such as the discovery of further landmines or unexploded ordnance (UXO). In conducting community liaison and risk education sessions, all communities are educated in the signage used in minefields and are made aware to the threats, items to be aware of and the actions to be taken if a suspicious item is found or encountered.

Project Implementation

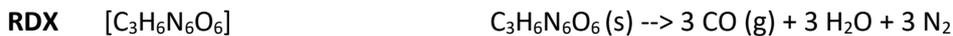
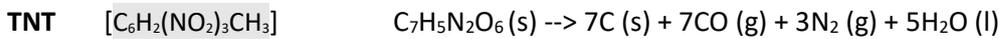
- **Grievance Mechanism:** FSD document all grievances from workers, communities and other stakeholders formulated on a register along with the responses given. Anonymity, if required, will be guaranteed.
- **Labour Conditions:** FSD has clear standards on labour conditions, which are set out in various documents such as FSD's Code of Ethics. FSD therefore ensures the following minimum labour conditions:
 - Children below 18 years will under no circumstances be employed by FSD.
 - FSD remunerates its employees under the principle "equal pay for equal work" under applicable remuneration standards and national employment laws in each country it works in.
 - Employment relationships between FSD and its staff are based on principles of equal opportunity, fair treatment, and non-discrimination (e.g. due to gender, age or origin).
 - FSD only accepts contributions from the community in the form of labour if it can be ensured that the contribution is given voluntarily and does not negatively affect livelihoods.
 - Under no circumstances will FSD make use of forced labour, including prison work.
 - FSD commits to ensure that the workforce has access to primary healthcare on site, providing prescriptions. The presence of qualified medics, ambulances and medical equipment, including first aid kits, during all demining activities is imperative, and FSD ensures to fully comply with any demining-related health standards as outlined in FSD's SOPs on Medical Support and Casualty Evacuation.
 - As part of any CASEVAC plan, FSD identifies emergency services (nearest hospital, health centre or doctor) and makes them available to workers in case of need. The medical evacuation assessment plan for each FSD demining work site forms an annex to the demining worksite task dossier, which is held on site at the control point as well as with the on-site medic and ambulance.
- **Occupational Health & Safety:** The need to reduce risk and to provide a safe working environment are fundamental principles of mine action management. FSD's specific measures are outlined in the following:
 - FSD ensures that the relevant health and safety measures for clearing landmines and unexploded ordnance (UXO) are regularly explained and rehearsed, including safe work practices, emergency procedures and the incident reporting requirements.
 - In compliance with international and national standards and best practice in HMA, FSD continuously records accidents, near misses and factors constituting unplanned dangerous situations, as outlined in all IMAS and national standards.
 - To ensure the safety of all employees and local community members, FSD continuously monitors all security warnings and has a proactive attitude vis a vis the security situation. Should the situation require it, FSD is not reluctant to evacuate personal to ensure their safety.
 - To ensure high workplace safety standards, FSD commits to equip its deminers with modern, functional demining equipment, to regularly check the equipment and to update/refurbish or replace outdated and worn out equipment.
 - FSD ensures the provision and use of effective Personal Protective Equipment (PPE), tailored to the explosive hazards that deminers are exposed to. In this context, FSD commits to always fully comply with the standards set in Personal Protective Equipment (PPE)

standards. In addition to this, FSD also commits to provide all staff protective clothing and uniform for their daily tasks so that a set may be worn whilst a set is washed for hygienic reasons.

- **Soil and groundwater contamination:** As obliged by international and national mine action standards for *Environmental Management* and internal SOPs, FSD will monitor any excessive kick-out from detonations following mine disposal operations. This specifically applies to disposal of any phosphorous ammunition or similar.

Landmines and Environmental Contamination

Vehicles are only used to transport staff to and from the minefield administration areas. Secondly, the destruction and disposal of mines, either by burning or by detonation only ever creates water vapour, nitrogen and carbon dioxide or carbon monoxide gases. 99.9% of explosives are organic nitrate-based hydrocarbon compounds and therefore are not polluting. There are a number of academic text books on the topic of Explosive Chemistry (Oxley J.C., 1998, Akhavan J., 2011, Agrawal and Hodgson 2007); the majority of mines and explosive ordnance encountered worldwide is either an organic derivative of TNT (trinitrotoluene or more specifically 2,4,6-trinitrotoluene) or RDX/HDX (cyclotrimethylenetrinitramine - C₃H₆N₆O₆) and these compounds break down thermally to produce:



Therefore, it can be proven that the largest output from the thermal detonation of these organic compounds is carbon, carbon monoxide, water and nitrogen which are all non-toxic in the free atmosphere as gases. There are some exceptions to this with more modern explosive compounds developed in high end missiles and munitions, however these are not encountered in the majority of FSD's programmes.

Some authors have looked at the possible polluting effects of explosives on the environment of explosives (Burrows et al., 1989 and Ghalaieny, 2013), especially in relation to organic explosives and other explosive remnants of war. However, it can be drawn from the discussions surrounding the topic that most, if not all, of the concerns relate to pollution from the physical toxic effects of un-decomposed explosive residue and particles within military firing ranges and high use demolition grounds. Over many years the issue of pollution by excessive demolitions and the transportation of explosives in those areas can cause some raw particulate contamination of the ground and storage areas which commensurately can have an accumulative effect on the soil. As de-mining does not involve large scale demolitions or long-term storage of munitions, this concern is not applicable; small scale demolitions of mines and explosive remnants of war are conducted with recovered mines and ammunition under this project, but only in designated demolition areas from the national authority. Even then, the scale of demolitions is nowhere near the years of exposure and the levels of contamination that even approach the concerns of academics and research on the issue of environmental pollution from post thermal decomposition of organic explosives.

Community Health & Safety

- **Mine Field Marking and Site Access:** FSD ensures to fully implement the restrictions to

access to de-mining sites as prescribed within SOPs as well as *IMAS 08.40 Marking mine and ERW hazards*. However, it should be noted that physical fencing requires special consideration due to prohibitive costs for miles of fencing required as a result of the large nature of hazardous areas, the subsequent theft hazard (for scrap salvage of fencing materials) and drawing community members towards the minefields to do this. As a physical safety measure, all access to any [demining worksite](#) is controlled through the [control](#) point which is clearly signed for all [visitors](#).

- Should the need arise to employ and place security personnel at any FSD work site, FSD ensures that they are properly trained in the use of force and appropriate conduct toward workers and affected communities.
- [To avoid security risks, FSD ensures that extracted landmines are not available for reuse. Landmines will be destroyed/disposed of as soon as reasonably possible.](#)
- [In addition to the above measures, if demolitions are conducted in the vicinity of houses and the presence of the public, sentries are posted, advance warnings and communications are transmitted to communities and cordons are set as appropriate/needed in accordance with IMAS.](#)
- **Soil Management:** Any disposal of mines or explosive remnants of war will be conducted within defined demolition areas by FSD demining teams. These areas are selected due to their suitability with regards to no vegetation (due to fire risk), no stones (due to enhanced fragmentation/kick out) and free land which does not affect the community or the local population. After demolitions have been carried out, the site is returned to the community and the national authorities along with the handover of the land. There is no land lost due to this process. Demolitions may create some small pits within the site chosen, but these are easily levelled and returned to normal and are accepted by the process of the handover to the national authority.

Bibliography

Agrawal J.P. and Hodgson R.D. (2007), *Organic Chemistry of Explosives*, John Wiley and Sons, Chichester, UK.

Akhavan J. (2011) *The Chemistry of Explosives Ed 3*, Royal Society of Chemistry, Cambridge.

Burrows E.P., Rosenblatt D.H., Mitchel W.R. and Parmer D. L., (1989), *Organic Explosives and Related Compounds: Environmental and Health Considerations*, U.S. Army Biomedical Research and Development Laboratory, Fort Detrick, MD.

Ghalaieny M. (2013), *Toxic Harm: Humanitarian and Environmental Concern from Military-Origin Contamination*, The Toxic Remnants of War Project, accessed online at: http://www.toxicremnantsofwar.info/wp-content/uploads/2013/03/Toxic_Harm_TRWProject.pdf, 29 Nov 2018.

Oxley J.C. (1998) *The Chemistry of Explosives*. In: Zukas J.A., Walters W.P. (eds) *Explosive Effects and Applications. High-Pressure Shock Compression of Condensed Matter*, Springer, New York, NY.

Stakeholder Engagement Plan and Record

[Enter Description of Programme and Activities]

FSD follows a do no harm framework, reviewed throughout the project to maintain a neutral, independent, humanitarian and impartial approach at all times. Through Non-Technical Survey and Community Liaison, FSD will interact with local communities to assess the impact of the intervention:

- Decisions on “who” are the beneficiaries of survey, EOD and clearance operations in order to maintain neutrality between communities and national priorities.
- Decisions on “who” is employed by FSD as local employees and to ensure a wide spectrum of the community are approached.
- Decisions on “what” and “how” operations are delivered and executed.
- Decisions on “who” FSD collaborates with and how.

FSD further ensures the local approval of any project implementation not just by seeking informal consent, but by requiring respective communities and local officials to actively issue letters of request before any action is taken. The request letters for the area in which FSD currently carries out PATRIP funded mine clearance are attached to this document.

Engagement Activities

During preparation of this project, the following activities were organised to disclose information and engage with stakeholders:

Stakeholder	Date	Method

Key Findings

The following concerns and suggestions were identified within stakeholder engagement and will be considered by FSD:

Concern/Suggestion	Stakeholder	Responses by the Project

Grievance Form	
Reference No:	
Full Name:	_____ <input type="checkbox"/> I want to remain anonymous
Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By phone: _____ By _____ Telephone (Please provide Telephone number): _____ <input type="checkbox"/> By E-mail: _____ <input type="checkbox"/> Other: _____ <input type="checkbox"/> I don't want to be contacted
Preferred Language for communication	<input type="checkbox"/> ... IP to include languages spoken in the region... <input type="checkbox"/> ...IP to include languages spoken in the region... <input type="checkbox"/> Other, please specify: _____
Description of Incident or Grievance:	
<i>What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i>	
Date of Incident/Grievance:	<input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	