

Environmental Pollution Programme – 2025/26

Short Form Business Case

Full Business Case (FBC)

Version No: 1.1

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Version Control

This document has been through the following revisions:

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V1.0		07/04/25	
V1.1		25/04/25	See highlighted sections, addressing Board comments
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Related Documents

This document needs to be read in conjunction with the following documents:

Document Name	Version	Reference/Location

Reviewer's List

This document has been reviewed by:

Name	Role (s)	Date
	Finance Business Partner	28/03/25
	Portfolio Management Office	25/04/25
	Commercial Business Partner	03/04/25

Document Sign Off

The role of the Senior Responsible Owner (SRO) is to ensure the delivery of a programme or project within an agreed budget and timeframe and as such should have authority to direct those involved in delivering the work. The SRO is responsible for delivery of benefits and is accountable. They must agree and verify the information and options put forward in this document.

This document has been signed off by the following:

Version	Role	Name	Approve	Date
1.0	SRO		Yes	07/04/25
1.0	Deputy Director		Yes	08/04/25
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1.1	Deputy Director		Yes	25/04/25

1. Executive Summary

Environmental pollution is a global challenge that affects climate, biodiversity and health. Pollution, along with biodiversity loss and climate change, is one of the three prongs of the 'Triple Planetary Crisis'.

The Environmental Pollution Programme (EPP) aims to reduce the impact of the 'Triple Planetary Crisis' and tackle environmental pollution at both a community and institutional level and across the pollutant's life cycle, by:

- Improving human health, creating the conditions for improved prosperity and reducing poverty;
- Slowing biodiversity loss, and therefore bolstering ecosystem resilience and support recovery of habitats and wildlife; and
- Contributing to climate change mitigation and adaptation.

The programme will take a multi-layered systems approach, aiming to reduce pollution, improve health and the environment and reduce the impact of the Triple Planetary Crisis in Southeast Asia and sub-Saharan Africa. The programme will continue and expand work on integrated pest management/pesticide use reduction, open burning/air pollution and sustainable waste management in Vietnam, and new programming in Uganda that will deliver work on sustainable waste management and pollution challenges, including air pollution. There will also be the establishment of regional fora to amplify the impact of our engagement in Southeast Asia and Sub-Saharan Africa. Additionally, the programme will cover delivery of work under the final year of UNECE's International Cooperative Programme ICP Vegetation (ICPVEG) contract and multi-lateral funding to continue to support to the existing Forum on International Cooperation on Air Pollution (FICAP). The total spend for 2025/26 will be £3m. The programme in Vietnam and Uganda will be delivered through our experienced partners, the Global Alliance on Health and Pollution (GAHP), whom we are successfully working with on the current phase of the programme in Vietnam.

If approved this business case would support the EPP to build on the success of existing programming in Vietnam and sub-Saharan Africa on agricultural pollution and waste management, broadening to other regions within Vietnam and other countries.

It will also provide practical, visible, UK financed work that demonstrates our commitment to UK negotiating positions under relevant pollution multilateral environmental agreement (MEAs) by providing resources for ODA-eligible countries to better implement their commitments under those agreements. This will help provide delivery of UK MEA objectives and better global outcomes for health and the environment, alongside further building UK relationships with ODA-eligible countries in these fora.

Additionally, it will strengthen and expand links between national, regional and local levels to develop community led solutions, spread existing successful interventions and design new ones that directly reduce pollution and environmental harms and poverty, improve health outcomes and capitalise on existing links between relevant national and international forums to strengthen and deepen capacity building functions to broaden the impact of the work.

All delivery outputs in 25/26 are not a commitment for further EPP engagement beyond that, and that will be made clear to all stakeholders.

2. Business case

a. Introduction

This business case is seeking approval for a continuation and expansion of the successful Environmental Pollution Programme (EPP). The EPP will be delivered in Vietnam, where the programme has already successfully worked on reducing pollution, improving outcomes for health and the environment and creating the conditions for improved prosperity and reducing poverty, and also Uganda.

The programme will take a multi-layered systems approach, aiming to reduce pollution, improve health and the environment and reduce the impact of the Triple Planetary crisis in Southeast Asia (SEA) and sub-Saharan Africa (SSA). The programme will continue and expand work on integrated pest management/pesticide use reduction, open burning/air pollution and sustainable waste management in Vietnam, and new programming in Uganda that will deliver work on sustainable waste management and pollution challenges, including air pollution. There will also be the establishment of regional fora to amplify the impact of our engagement in SEA and SSA. Additionally, the programme will cover delivery of work under the final year of UNECE's International Cooperative Programme ICP Vegetation (ICPVEG) contract and multi-lateral funding to continue to support to the existing Forum on International Cooperation on Air Pollution (FICAP). The total spend for 2025/26 will be £3m, with 90% of that CDEL and 10% RDEL spend.

We will draw on the successful learning from past work on the programme, including from recently concluded projects on waste and water pollution delivered by JNCC in South Africa, on how to deliver low cost, safe and financially sustainable solutions to improving health outcomes and reducing environmental harm from agricultural and waste pollution and spreading this learning amongst relevant community and government stakeholders. We will expand to include plastic, air, water and chemicals pollution and ramp up our approach to knowledge sharing through new and relevant existing fora.

The programme looks to ensure that stakeholders engaged can develop self-sustaining strategies to combat pollution issues identified, without relying on donors. For example, farmers in Vietnam have formed a cooperative to exchange knowledge and share expertise on integrated pest management (IPM) methods as a result of work already delivered by the programme. In addition, the government of Vietnam is looking to empower those farmers to engage in the carbon credits market as an additional income source, thereby reducing reliance on external funds.

b. Strategic case

Environmental pollution (including waste and chemicals) is one of the three 'Triple Planetary Crises', alongside biodiversity loss and climate change, and is one of the most serious challenges that affects human health and the environment globally. Welfare losses due to pollution are estimated to amount to US\$4.6 trillion per year. In developing countries, the effect of these drivers of pollution are magnified by a lack of data and knowledge, poor infrastructure and weaker regulatory systems.

In addition, pollution is transboundary by nature - pollution that may occur in one country is able to cause damage to health and the environment in another, be that through water or air pathways.

The UK is a Party to global, legally binding MEAs which aim to better manage environmental pollution, such as the Basel, Rotterdam, Stockholm and Minamata Conventions. We are also a leading voice in the negotiations and adoption of new MEAs on pollution. We are a founding member of the High Ambition Coalition to End Plastic Pollution, a group of over 60 countries calling for an ambitious and effective treaty that will end plastic pollution by 2040 – with Defra leading for HMG on those treaty negotiations. We are one of the lead countries for the establishment of the global

Science Policy Panel (the IPCC for pollution), co-sponsoring the UNEA Resolution that kickstarted that process. We also took a leading role in the recently negotiated Global Framework for Chemicals, successfully championing measures on chemical and pesticide reduction and the uptake of alternative and sustainable techniques.

The UK is a global leader in air quality expertise, holding a number of high-profile positions, including Vice Chair of the UNECE Convention on Long Range Transboundary Air Pollution (CLRTAP). This convention is currently negotiating changes to the air quality protocol which will include new international air quality targets. The UK co-chairs, with Sweden, the Forum for International Cooperation on Air Pollution (FICAP), which has the specific aim of increasing the capability of developing countries in this sphere. The UK also co-sponsored and is actively implementing the UNEA-6 Resolution on 'Promoting regional cooperation to improve air quality globally', as well as working closely with UNEP, the Climate and Clean Air Coalition (CCAC), the WHO and other IGOs and NGOs to create opportunities for greater cooperation and implementation of measures to tackle air pollution at a local, national, and regional levels.

This programme will complement all of these non-ODA levers, capitalising on existing links between the relevant international forums and MEAs. It will provide practical, visible, UK financed work that demonstrates our commitment to UK negotiating positions under relevant pollution MEAs (such as the Basel, Rotterdam, Stockholm and Minamata Conventions, Global Framework on Chemicals and Science Policy Panel and the currently being negotiated Plastic Pollution Treaty) by providing resources for ODA-eligible countries to better implement their commitments under those agreements. This will provide delivery of UK MEA objectives and better global outcomes for health and the environment, alongside further building UK relationships with ODA-eligible countries in these fora.

Vietnam is a high priority country for Defra for pollution and Uganda was selected following a prioritisation exercise on priority SSA countries. The programme also delivers against 'Reduce the risks and negative impacts of pollution on land, air, fresh water and marine environments to support nature, climate and health outcomes for low-income communities' - one of the five priority outcomes currently identified by Defra's ODA portfolio.

On a broader strategic level, UKG has committed to 'create a world free from poverty on a liveable planet'. This builds on the 2023 UK Development White Paper which identified pollution as a key risk to the UK's national interests, and that it should be tackled alongside poverty reduction and climate change.

The FCDO White Paper, 'International development in a contested world: ending extreme poverty and tackling climate change', states that a key aspect of the UK's vision for 2030 is that we will tackle poor air quality, reduce pollution in low- and middle-income countries, and ensure that people will breathe clean air. The Ending Preventable Deaths of mothers, babies and children by 2030 strategy also focuses on helping to 'tackle the threat of air pollution', noting that the 'effect of air pollution on respiratory illnesses, especially in children, is spiralling upwards', and commits to working with countries to 'understand and address the sources and impacts of air pollution on health'. It also states that the UK will 'establish a new global trajectory to help tackle the spiralling threat of air pollution'.

Alongside delivering on the strategic aims outlined above, the work of the programme will complement other Defra ODA-funded programmes, such as the marine pollution strand under the Blue Planet Fund; the analysis of biodiversity loss drivers being conducted under the Biodiverse Landscapes Fund and the proposed Global Centre of Excellence for Nature Based Solutions, which is focussed on developing country case studies. It will also complement broader cross-Whitehall programming, like the FCDO's Sustainable Manufacturing and Environmental Pollution (SMEP) programme, which aims to assist in the development of technological solutions to pollution challenges; and DHSC's International Health Regulations (IHR) Strengthening project, through which the UK works closely with the World Health Organisation (WHO) to enhance global and country level health security.

The Climate and Nature lead at Post in Kampala has indicated that pollution issues (particularly air and water) are significant issues in Uganda. We will continue our dialogue with them and explore how the EPP feeds into any work they are doing, as relevant. There is strong demand and commitment to work on pollution issues from multiple stakeholders in the Government of Uganda. Over the past five years, Uganda has taken some steps to address the country's growing pollution challenges. The passing of the National Environment Act in 2019 strengthened the enforcement powers of the National Environment Management Authority (NEMA) to safeguard every Ugandan's right to a clean and healthy environment. This legislation laid the legal groundwork for pollution control licences and restoration orders. In April 2024, Uganda introduced its first National Environment (Air Quality Standards) Regulations - these regulations cap stack and vehicle emissions, mandate the adoption of modern emission-control technologies, and require annual compliance reporting by operators. Plastic waste is also being targeted through the National Strategy for Promoting Plastics Circularity 2023–2028, which introduces extended producer responsibility schemes alongside incentives for waste sorting, collection, and recycling. In the transport sector, Kampala hosted Africa's first TRUE real-world vehicle emissions testing campaign in July 2024. Complementing this initiative, the Ugandan government has earmarked approximately US\$132 million to support Kiira Motors in scaling the production of locally manufactured electric buses, with the goal of transitioning the majority of public transportation to electric by 2030. Senior government representatives, including the Chair of the Parliament Forum on Environment and Natural Resources, have made public statements in the last year on the need to deliver initiatives aimed at protecting the environment and saving lives from pollution.

One example of this is our delivery partner GAHP collaborating with the government in 2024 to set up a working group to specifically address lead pollution. This proposal was initiated by NEMA and also involved the Ministry of Water and Environment, the Ministry of Trade, Industry and Cooperatives, the Ministry of Gender, Labour and Social Development, the Ministry of Finance, the Parliament of Uganda, and other stakeholders. NEMA is the primary governmental body responsible for monitoring, coordinating, supervising, and regulating Uganda's environmental policies. The group initially concentrated on lead pollution, but stakeholders also highlighted pressing other pollution challenges in Uganda, including agrochemical pollution of water and land - one of the key issues the EPP seeks to address.

With this working group already established, the EPP will provide VfM, politically robust and efficient approaches to delivering a standalone Health and Pollution Action Plan (HPAP) that enables authorities at regional and national levels to identify pollution control actions that yield the greatest benefits to health and the environment. Given the evidence on the commitment of the Government of Uganda to implement work on many aspects of pollution, now is an excellent time to drive forward work on a HPAP through the EPP. Other countries in the SSA region will also benefit and will be empowered to act, and this is important given the transboundary nature of pollution. This is evidenced by Vietnam's influence on other countries in SEA where the IPM initiative from the previous phase of the EPP is being used as a blueprint to address pollution issues in neighbouring countries. There will be value added even if UK government funding for Uganda does not go beyond 25/26 as the work undertaken in this year will be standalone, enabling clear and nationally defined priorities for future work and potential future support from other multilateral funding avenues.

Environmental Pollution in Low to Middle Income Countries (LMICs)

Environmental pollution (including air, waste and chemicals) is one of the most serious global challenges that affects biodiversity, ecosystems, and human health worldwide. Welfare losses due to pollution are estimated to amount to US\$4.6 trillion per year, which is 6.2% of global economic output. Key causes of pollution in developing countries are the growth of cities, rising demands for energy, increased mining and smelting, the global spread of toxic chemicals, use of pesticides and increased use of petrol and diesel powered cars, trucks, and buses. In developing countries, the effect of these drivers of pollution are magnified by a lack of data and knowledge, infrastructure, and weaker regulatory systems.

Human Health

Diseases caused by pollution were responsible for an estimated 9 million premature deaths in 2015—16% of all deaths worldwide—three times more deaths than from AIDS, tuberculosis, and malaria combined and 15 times more than from all wars and other forms of violence. Those impacts are disproportionately affecting the most vulnerable groups in the most vulnerable parts of the world, as evidenced by 99% of the 3 million people poisoned by pesticides annually and 90% of the 7m annual air pollution related deaths occurring in LMICs. Although pollution associated with deep poverty, such as household air and water pollution, are on the decline, chemical pollution is on the rise, along with ambient air pollution and soil pollution. Associated deaths are rising at unprecedented levels.

Climate Change

Rising temperatures as a result of climate change are exacerbating these impacts. Climate change alters temperature, precipitation and frequency of extreme weather events and can increase pollution impacts. For example, climate change can influence release of reactive nitrogen which has knock-on effects for the sequestration of carbon and ecosystem function, demonstrating the interconnected nature of pollution, biodiversity loss and climate change.

Biodiversity

According to the 2019 report by IPBES, alongside changes in land and sea use, direct exploitation of organisms, climate change and invasive alien species, pollution is amongst the top five drivers of biodiversity loss. The report states that although global trends are mixed, air, water and soil pollution have continued to increase in some areas. Greenhouse gas emissions, untreated urban and rural waste, pollutants from industrial, mining, and agricultural activities, oil spills and toxic dumping have had strong negative effects on soil, freshwater and marine water quality and on the global atmosphere.

Addressing the Problem

Compared with emissions control at source, removing pollutants once diluted in the environment is challenging and costly. Pollution is transboundary by nature - pollution that may originate in one country is able to cause damage in another, by crossing the border through pathways of water or air. This demands a global response creating a strong case for a programme that focusses upon the monitoring, management, and ultimate reduction of pollution at source, in support of multilateral action.

The role of UKG and Defra

Defra's domestic responsibilities for improving and protecting the environment means it has considerable scientific capability and expertise on pollution issues, both centrally and within the ALBs. Defra leads HMG's work on tackling poverty, nature loss and climate change. Defra also leads on international air quality, marine, chemicals, waste and plastics pollution. We are global leaders on international pollution negotiations and diplomacy, and we are uniquely positioned to draw on a significant level of UK-based expertise, recognised as global leaders in their field, to deliver a reduction in pollution. We can bring this expertise to bear in the EPP, both through formal involvement of officials through channels like the Programme Board or more informally via working level contacts and input.

Objectives of the programme

Vietnam

- Continue and expand work on IPM, agricultural open burning and alternatives into additional regions within the country and trial sites.
- Expand open burning work into the waste sector to identify waste burning hotspots, pollution impacts and promote/design safe and sustainable alternatives.
- Assess current waste management strategies, with a focused element on plastics in agriculture including chemical containers, plastic wrap/crop protection including disposal and associated pollution impacts.

- Develop an integrated and inclusive approach to effective waste management at both a national and community level through both policy and community engagement.
- Conduct research and promote sustainable waste management routes with a focused workstream on plastic waste and identifying sustainable plastic alternatives where appropriate.
- Increase IPM outreach, to monitor and provide sustainable alternatives to pesticides.
- Increase air quality monitoring to be able to review air pollution levels.

Uganda

- Review of the country's waste management and agriculture strategies and policies.
- National and community engagement to review pollution challenges at different levels and identify potential solutions, delivering a Health and Pollution Action Plan (HPAP) endorsed by all key stakeholders, serving as the national roadmap for coordinated pollution reduction efforts.
- Identifying the optimum in-country delivery partner to conduct programming activities.
- Developing a robust workplan for delivery during further phases of the programme.

Regional Fora

- UK coordination to share lessons learned and best practice on transboundary issues, establishing a Regional Forum in Vietnam for SEA.
- Support countries in SEA and SSA to create plans and bids under existing MEA funds, the UN Special Programme, GPAP and any new technical/capacity building fund associated with the plastic pollution treaty that is currently being negotiated.
- Facilitate contact between UK and ODA eligible countries on policy or scientific expertise.
- Engage stakeholders in Uganda so they gain knowledge of the benefits of the SEA Forum.

Delivery of UNECE's International Cooperative Programme ICP Vegetation (ICPVEG) under existing 2022-26 contract

- Support the work of the UNECE Convention on Long Range Transboundary Air Pollution (CLRTAP) by reviewing the state of science and analysing potential mitigation routes on the effects of air pollution on crops and semi-natural vegetation.
- Implement the workplan agreed with parties to the Convention by supporting the work of ICP Vegetation. This support also provides part of the UK's contribution, in kind, to the funding of the Convention.
- Support international policy development making assessments of the co-benefits of air pollution and climate change abatement policies on crops and on natural and semi-natural vegetation.
- Promote the economic development and welfare of developing countries using outreach activities and targeted scientific analysis.
- Provide UK-specific data to assess the impacts of air quality on ecosystems and contribute in part to the UK's implementation of Part 5 of the NEC Regulations 2018.

Funding to support the existing Forum for International Cooperation on Air Pollution (FICAP)

- Cover the costs of the contributions to this UK co-owned forum, under the CLRTAP.
- Continue to organise meetings to facilitate knowledge sharing and the provision of expertise and tools for the benefit of ODA-eligible countries.

The programme delivers against multiple ODA indicators:

- ICF KPI 1 - Number of people supported to better adapt to the effects of climate change as a result of ICF.

- ICF KPI 4 - Number of people whose resilience has improved as a result of ICF.
- ICF KPI 6 – Tonnes of greenhouse gas emissions reduced or avoided.
- ICF KPI 15 - Extent to which ICF intervention is likely to lead to transformational change.
- ICF KPI 11 – Public finance mobilised.
- ICF KPI 12 – Private finance mobilised.
- ICF KPI 17 - Hectares of land that have received sustainable land management practices as a result of ICF.
- ICF TA KPI 2 – Number of people informed by Technical Assistance.
- DI 5 – Solid waste and pollution reduced or removed.
- DI 7 – People benefitting from strengthened or new livelihoods.
- DI 9 – People with improved income
- DI 10 – People with improved food security.
- Number of case studies demonstrating change.
- Number of knowledge products produced to support operational implementation of sustainable biodiversity activities.
- Number of knowledge products produced to support 'policy implementation/production supporting and mainstreaming the use of sustainable biodiversity activities.'
- Number of people more aware of and engaged with pollution issues.
- Number of people more aware of and engaged with climate issues.
- Hectares where sustainable agricultural practices are now used as a result of the project.

Gender Equality, Disability and Social Inclusion

Defra ODA programmes have a legal duty to demonstrate compliance with the International Development Act (2002), the International Development (Gender Equality) Act 2014 and the Public Sector Equality Duty (PSED). The main EPP delivery partner, GAHP, is delivering a programme that is contributing to reducing poverty in a way that reduces inequality between people of different gender. It is the responsibility of the SRO to ensure that the impact of this development assistance on gender equality receives ongoing consideration. This will be achieved through GEDSI analysis and commitment to a GESI action plan.

The programme contributes to the UK's Strategy for International Development by fostering sustainable development and economic growth in ODA-eligible countries. In alignment with the International Women and Girls Strategy, interventions empower women and girls through education to unlock their potential and help protect against abuse.

The programme supports the Disability Inclusion and Rights Strategy by promoting the rights and inclusion of people with disabilities through meaningful participation and consideration throughout the design, awareness raising, capacity building, and decision-making activities. Partners will encourage active participation of women, youth and other marginalised groups through awareness raising, capacity building, engagement of community leaders and men as champions, inter-generational learning and active engagement of local NGOs and governmental institutions.

It is important that those involved in the delivery of this programme are committed to taking full advantage of the beneficial environmental and social outputs of their work, while at the same time mitigating any potential risks and negative outcomes that may exist particularly for local communities, but also other people and natural capital.

Those involved in the delivery of the project are adhering to HMG standards, by taking all reasonable steps to safeguard the people they come into contact with (including staff and the communities in which programmes are delivered), and that the project complies with two sets of international minimum standards on tackling Sexual Exploitation, Abuse and Sexual Harassment (SEAH): the

Inter-Agency Standing Committee Minimum Operating Standards on Preventing Sexual Exploitation and Abuse and the relevant sections of The Core Humanitarian Standard on Quality and Accountability.

As per the key principles of the HMG SEAH safeguarding, it is important that those involved in the delivery partner do not harm, that they act with integrity, transparency, and accountability, and that they take seriously their responsibility for safeguarding and their duty of care to beneficiaries, staff, and volunteers, including where down-stream partners are part of delivery. This also includes children and vulnerable adults in communities who may not be direct beneficiaries of the project but who may still be vulnerable to abuse.

Transparency is hugely important, and delivery partners are expected to contact Defra immediately if any concerns are raised relating to safeguarding and equality.

In the design of the programme, consideration was given when addressing the 'Triple Planetary Crisis' to how interventions can reduce gender inequality and deliver sustained improvements in community lives. In developing countries, poverty, lack of education, corruption, poor regulatory frameworks and limited availability of non-polluting products or methods can all lead to greater impacts of pollution on disadvantaged groups. The unsafe practices of open burning and pesticide use are detrimental to human livelihoods, contributing to pollution of land, water and air, and public health impacts. Women, children and disadvantaged communities bear the greatest impacts of pollution. Raising awareness and finding sustainable alternatives allows these groups to receive the greatest reward.

The approach taken by GAHP and in-country partners promotes gender equality and inclusivity, with a focus on women's self-empowerment and leadership in agricultural management. The project encourages women to participate in training programmes and monitoring activities, giving them the tools to take control of their roles in sustainable agriculture. Special emphasis is placed on including vulnerable groups, such as ethnic minorities, to ensure that they have equal opportunities to benefit from the project's interventions.

This approach also aligns with law in Vietnam and promotes the inclusion of young farmers, encouraging them to become involved in agricultural practices, helping secure the future of sustainable farming. By paying particular attention to women, ethnic minorities, and younger farmers, the project fosters a more egalitarian and inclusive agricultural environment, contributing to broader social and economic development.

Our GESI action plan will be the roadmap for the next phase of work in Vietnam and Uganda. This builds on previous work, identifies our current position and outlines our future ambition. It will also serve as our accountability mechanism across six broad areas: analysis, engagement, monitoring, team capacity, identification and mitigation of safeguarding risks. Using learning from the previous programme, we will undertake the specific activities outlined below:

Vietnam:

We will focus on the inclusion of women, youth and other marginalised groups, including IPLCs and people with disabilities.

- Conduct an in-depth gender, disability and social inclusion analysis at the start of the project, building on previous findings, to further understand the local context and the barriers that women, youth, IPLCs, people with disabilities and other marginalised groups face. Based on the findings, a GEDSI strategy will be developed with the active participation and representation of the different stakeholder groups.
- Provide training opportunities through IPM interventions to improve the professional capacity and training skills of female trainers in Farmer Field Schools, creating an enabling environment to empower them as leaders. The project will use analysis to improve access for people from under-represented backgrounds to technical training with a minimum target of 60% female participants, 40% of participants from ethnic minorities and 20% of participants being young farmers who are under 35 years old.

- Explore through GESI analysis the role of vulnerable groups in economic activities of formal and informal waste management systems. This will include but not limited to women, young people and ethnic and other minorities. Waste pickers within the informal waste sector have very low levels of income and are predominantly women - up to 90%. Interventions will aim to incorporate a formal waste recycling system to improve livelihoods, reduce inequality and alleviate poverty.

Uganda:

The GESI action plan will identify gaps, integrating poverty and GESI considerations.

- Analyse how the waste and agricultural pollution management policies address or impact poverty, gender equality and socially excluded groups.
- Identify policy gaps where women, young people and marginalised communities are disproportionately affected by pollution. Workshops will be held with national agencies, women's groups, youth representatives and marginalised community leaders to gather diverse insights to create a comprehensive policy review report with recommended poverty and GESI targeted interventions.
- Assess health impacts and source apportionment, through the Uganda air pollution study, on different groups. This will enable targeted interventions to reduce exposure and health inequalities. Morbidity incidence estimates by age and gender will highlight differential impacts and inequalities among population sub-groups.
- Empower civil society organisations, through the CSO Campaign, to increase pollution awareness to advocate for pollution prevention and control, with at least 30% representing women, youth, and marginalised groups. Our delivery partner GAHP will engage with a diverse CSO network to provide capacity-building and ensure campaign messaging includes diverse perspectives. Engagement data will continue to be disaggregated by gender as a minimum.

Safeguarding

The delivery partners are committed to maximising the positive environmental and social outcomes of its work while minimising the risks and negative impacts to people and natural capital. This means protecting and investing in natural and social resources, responding to the challenges of climate change, promoting sustainable infrastructure solutions, and ensuring social inclusion and accountability. The delivery partners have provided safeguarding assurances, and any third parties consulted on their behalf have the policies and processes in place to ensure the four key points below are implemented:

- Provide a safe and trusted environment which safeguards anyone who your organisation has contact with, including beneficiaries, staff, and volunteers;
- Set an organisational culture that prioritises safeguarding, so that it is safe for people to report any incidents and concerns with the assurance they will be handled sensitively and properly;
- Have adequate safeguarding policies, procedures, and measures to protect people and these are shared and understood; and
- Are clear as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities.

Delivery partners GAHP have a clear safeguarding policy. In addition, GAHP ensure all contracts and partnership agreements include a standard clause requiring contractors, suppliers, consultants and sub-partners to commit to a zero-tolerance policy on SEA and to take measures to prevent and respond to SEA.

Fraud Risk Assessment

Defra follows HMG best practice on avoiding fraud and corruption which is for all organisations to have a zero-tolerance approach to fraud and corruption. The programme has a fraud risk assessment (FRA) in place which identifies key risks, controls (including directive, deterrent, preventative and detective controls), risk ratings and risk owners. The assessment identified four fraud risk areas, with scores ranging from low to medium risk. Risk owners have concluded these

residual risks are within the programme's tolerable range and are confident the controls in place will help mitigate these risks. The FRA is available to see on request.

Sustainability, Climate and Environment

The overarching objective of the programme is to reduce environmental pollution, helping to slow biodiversity loss and contributing to climate change mitigation and adaptation. As such, the interventions will provide positive environmental impacts and deliver improved environmental outcomes.

A climate and environmental risk screening assessment was completed and found that the risk to this programme and its objectives is low in both instances. The main environmental risk of the programme is the pollution associated with air travel. To mitigate this, the Defra team will work with the main delivery partner to limit the impact on the environment through virtual meetings and events or choosing transportation with a lower environmental impact when in country. The climate screening also had a low score as it will not operate in high-risk environments with minimal risks from natural hazards, therefore a further CRAA will not be required. It aligns with the Paris Agreement. As the programme is under £10 million, shadow carbon pricing appraisal is not required. The programme will not invest or provide any support for fossil fuels and will be aligned with the Nationally Determined Contributions of the two main programme countries.

GAHP, the main delivery partner based in Switzerland, adheres to '2050Today'. This is the Geneva climate action forum where institutions of 'International Geneva' come together and work towards reducing their greenhouse gas emissions. GAHP strive to minimise emissions through their work. For example, GAHP work in a hybrid form, adopt digital tools to reduce travel, use energy-efficient practices and encourage sustainable practices among partners and stakeholders. For long trips where air travel is unavoidable, GAHP compensate for carbon emissions where possible.

c. Economic case

Options to consider

There are two options to consider – approval for delivery of the full programme with the funding allocated or not to give approval for that spend. There is a preference to deliver the full programme, as summarised in the table and then detailed in the following text below.

Option	Description	Benefits delivered / issues involved	Reason for short list or rejection
0	<i>Do Nothing</i> – there is no spend approved on the EPP for 25/26	Work on existing commitments to ICPVEG and FICAP is stalled or even stopped, with reputational risk. Assurances given to delivery partners on 25/26 programme are not delivered on. We do not deliver the 'on the ground' aspects of the programme or multilateral objectives, allowing developing countries to work on pollution issues through MEAs.	Does not give approval to the allocated spend, delivering on the objectives and benefits to UKG noted in the strategic case.
1	<i>Preferred way forward</i> - give approval to the allocated spend	Programme delivers on objectives and benefits to the UKG, as outlined in the strategic case. There are risks that work, particularly on the Uganda and regional forum part of the programme, cannot be continued beyond 25/26 due to funding constraints - and raises expectations amongst stakeholders. Mitigations include ensuring delivery of all outputs in 25/26, ensuring stakeholders are clear the work is not a commitment to further activities in 26/27 and beyond and that the work provides a sustainable basis for the Government of Uganda to take forward even if further external funding is not available.	

Table 1 Options

Evidence from the work already delivered through the programme, which includes development of pilot approaches, has shown a partial BCR of 2.1 for open burning. However, this is a significant underestimate as it only includes direct benefits from improved farmer income and greenhouse gas emissions. The calculation excludes most environmental and health benefits that could not be quantified – those non-monetised benefits are detailed below.

Data from the IPM approaches for tea demonstrate partial BCR of 5.9-11.8 based on increases in farmer income from greater yields and the ability to charge higher prices from reduced pesticides. It is anticipated that the BCR for coffee may be higher. Environmental benefits from reduced pesticide

use have not been quantified or monetised although it is recognised by UNEP that pesticides are one of the top five drivers of biodiversity loss globally.

The programme is set to achieve ecosystem benefits through reduced environmental pollution. For context, marginal impacts on species recovery can have significant benefits in terms of £s. Environmental Economics Consultancy (Eftec) have calculated the value of species recovery per hectare of land at £500k-700k per year.

The programme's amplified impact will further boost farmer income and reduce GHG emissions. It will also generate broader economic benefits through lower healthcare costs, increased adult incomes due to reduced pollution-related health issues, biodiversity gains from decreased waste and chemical pollutants. In addition, food security, soil and water quality will be enhanced.

We have not provided a full BCR as most of the environmental and health benefits of the proposed work are difficult to quantify. There are currently no standard approaches to quantifying the links between pollution, species loss and ecosystem services, for example.

Our approach to reducing pollution has significant non-monetised benefits. At a local level, the programme increases community resilience to climate change, improves health outcomes and provides significant environmental benefits. At a global level, the programme fosters collaboration between countries, sharing knowledge and best practices to tackle transboundary pollution more effectively on a global scale, therefore, increasing uptake in developing countries. Benefits include:

Human health benefits - Pollution from contaminated water, soil, and air poses serious health risks. Waste burning releases pollutants like PM2.5, causing respiratory and cardiovascular diseases. In Vietnam, hazardous pesticides used on 35% of coffee, 7% of pepper, and 27% of tea farms are linked to cancer, skin disorders, and neurological issues. Through the program, 18,000 training sessions have been delivered to farmers on IPM and adopting safer more sustainable practices, while 472 farms now use non-burning methods, reducing health risks and costs. Scaling this program with partner countries is expected to deliver exponentially greater benefits.

Wider air quality benefits – Air pollution reduces health demographics and ecosystem health. Local, regional, and global emissions play a role in each territory and increase health system costs while reducing economic productivity. The Clean Air Fund estimates 11.2 billion workdays are lost in global productivity due to air pollution. The World Bank estimates that health damage caused by air pollution costs \$8.1 trillion a year, equivalent to 6.1% of global GDP. Our work to improve air quality through bilateral programmes, the regional forum and MEAs will directly contribute to reducing these risks to health, economy and environment.

Improved climate change resilience – Reducing plastic use and preventing the open burning of agri-wastes will reduce greenhouse gas emissions. It is estimated the Vietnam programme so far will reduce the release of over 10,000 tonnes of GHG valued at £2.3m across 10 years (discounted). A scaled-up programme with an additional element focussing on waste management will significantly increase this benefit.

Poverty reduction - Adopting IPM can significantly boost farmer income by reducing costs and improving crop yields. In Vietnam, tea farms within our existing programme increased profits by 5-15% and coffee farmers gained a 50% profit boost. This has resulted in enhanced seller reputation and improved access to export markets where there is growing demand for sustainable goods due to reduced pesticides use. Early data for tea suggests an increase of farmer income of £8.3-16.6m over ten years while economic benefits from alternative practices to burning, such as microbial treatment on rice straw suggests additional profit of £162 per 2600 m² or £1.1m in total over 10 years (discounted). Larger in-country partnerships and increased scope, incorporating waste management, will increase benefits and generate additional income through circular economy principles and safer recycling.

Reduced biodiversity pressure - Reducing pesticide use supports the recovery of ecosystems, beneficial to insect populations like pollinators, which are crucial for agricultural productivity—75% of global food crops partially or fully rely on insect pollination. Reducing plastic use and managing waste properly prevents animals from ingesting harmful plastics, reducing injuries, poisoning, and mortality risks. Furthermore, reductions in air pollution reduces the damage to habitats through direct harm and through acidification and nutrient enrichment (eutrophication) of soils. This can cause loss of sensitive plant species, together with the animals that rely on them for food and shelter, resulting in local extinctions.

Improved soil health - Burning agri-food waste depletes soil organic matter, weakening fertility and agricultural productivity, leading to increased reliance on chemical inputs. Improper disposal of plastic containers contaminates soil, while overuse of pesticides disrupts essential soil microbes. Reducing these activities helps recovery of soil microbiome and fertility with better water retention and nutrient availability. Practices like mulching, shade trees, and cover crops under IPM improve soil fertility, water retention, and nutrient availability, while reducing erosion and runoff.

Reduced water contamination - Reduced pesticide and fertiliser usage to prevent contamination within surrounding water bodies lowers the risk of eutrophication or toxicity in local water bodies and improves aquatic life and local communities that rely on these water sources for drinking and irrigation. Proper waste management prevents plastics from polluting rivers and oceans, reducing flooding and water contamination, and enhancing climate resilience.

Benefits of the work of the EPP are distributed among different groups with significant impacts on poverty reduction, primarily for farmers and agricultural communities, low-income communities, women and marginalised groups.

Farmers and agricultural communities - Over 18,000 IPM training sessions have been delivered to farmers through the current programme. Scaling up to new regions and additional crop types will increase outreach significantly under the future programme. Reducing chemical inputs and adopting sustainable farming practices create additional safe income streams. These are crucial for diversifying and stabilising the incomes of these communities ensuring the sustainability of livelihoods. By reducing pesticide use and open burning, access to trade/markets is widened, and health impacts of farming in vulnerable communities are reduced. This leads to better health outcomes; lower healthcare costs and mitigates the impacts of poverty.

Women and marginalised groups - Engagement with local communities from the outset improves livelihoods, builds capability through education and identifies employment opportunities. Adopting alternatives to open burning offers flexible working hours and potential for indoor cultivation of alternatives such as mushrooms providing direct benefits for women and the elderly. This targeted support empowers marginalised groups through improvements to their economic status and independence. Reduced pesticide uses and open burning lead to better health outcomes, which is particularly beneficial for women who often bear the brunt of health issues in families.

Low-income communities - These communities often face significant health impacts from waste pollution and contaminated food, soils and water. By improving access to clean food, air, and water, interventions directly reduce costly health issues, leading to better overall well-being which can improve worker productivity and income. This is particularly beneficial for women and marginalised groups, as interventions focus on boosting their revenue streams from waste and reducing health impacts.

Preferred way forward/options

The preferred way forward is option one - give approval for the full allocated spend. This delivers on the issues and objectives stated in the Strategic Case above. These centre on developing low cost, safe and financially sustainable solutions to better manage agricultural, plastic, chemical, air, water and waste pollution, resulting in improved health outcomes and reductions in environmental harm. The programme will also deliver multilaterally for UKG by capitalising on existing links between

relevant international forums to strengthen and deepen relevant capacity building functions to broaden the impact of the work, facilitating greater cooperation and implementation of measures across SEA and SSA to tackle pollution issues. **We can be clear with stakeholders that outputs for delivery in 25/26 are not a commitment for further EPP engagement beyond that.**

The work delivered in Uganda and on the Regional Fora will standalone and be impactful to multiple stakeholders in 25/26 and deliver on the objectives for those arms of the programme, as stated under the Strategic Case and as below.

- Reports or any other work produced on the review of Uganda's waste management and agriculture strategies and policies and engagement with national and community stakeholders to review pollution challenges at different levels and identify potential solutions will be of standalone benefit to multiple stakeholders, irrespective of whether that work becomes a basis for further work on the programme in the country. As noted above, delivering these will not be a commitment for further work.
- The work of the programme with stakeholders in Uganda will bring benefits in building relationships and understanding specific issues/context around the pollution and waste MEAs and delivering UK objectives in those fora.
- Delivering work on solutions to pollution issues in Uganda will also raise awareness amongst relevant stakeholders across SSA. We will also be able to involve those stakeholders in the work of the Regional Forum in SEA, facilitating knowledge sharing and the provision of expertise and tools for the benefit of ODA-eligible countries.
- In addition, GAHP currently work in Uganda on other relevant programmes that bring together government officials, NGOs and communities so the 25/26 EPP work would not raise expectations or engage with completely new stakeholders – particularly if we are clear from the start on 25/26 outputs and that they are not a commitment for further work.

There are potential risks if we start initiatives this year that cannot be continued beyond 25/26. However, these must be considered with all of the standalone benefits outlined above and reputational risks with delivery partners in mind.

It is the recommendation here that approval for the already committed full spend is given and work to start straightaway. Any delays on work will add new risks on delivering outputs in the timescales required in 25/26.

d. Commercial case

The commercial approach taken as part of this ODA programme has been informed by the ODA commercial team, who will continue to provide advice and support to the programme leads after the business case is cleared. Consideration of the most suitable delivery mechanism (grant or contract) concluded that a contract is most suitable given the specific outputs and requirements.

GAHP, the main delivery partner, were first appointed in June 2022 to work with Defra on environmental pollution under a direct award contract to work exclusively in Vietnam. They are the primary delivery partner for the current programme and have extensive experience in guiding and delivering ODA-related activities. GAHP are most suited to delivering on the key aim of the programme – to improve the ability of the selected countries to monitor, manage and reduce air, chemical, plastic and waste pollution – considering their extensive expertise, experience, and existing networks which can be utilised to deliver activity in-year. GAHP have been a successful delivery partner fulfilling all their obligations and have surpassed expectations set out in previous contracts for both quality and quantity of work delivered.

GAHP are a not-for-profit company established in 2012 with 60 international representatives from the World Bank, UN, Asian Development Bank and Ministries of Environment and Health of many LMICs.

A commercial strategy has commercial approvals to direct award the contract on the basis that competition is absent for technical reasons. This is based on the unique position that GAHP operate in, i.e. that they were created to formulate strategies to address pollution and health at scale and have the necessary licences to operate in ODA eligible countries. The Direct award is made under PCR2015 using exemption 32.2.B.2, a notice of the intention to direct award (VEAT) and a ten-day standstill period has been completed. The risk of challenge is therefore low.

ODA commercial have carried out an assessment of the full breakdown of costs and workplan. Day rates have been compared against existing ODA contracts for both UK and in country staff, with the outcome being favourable.

The programme will build on successful work already delivered by GAHP in Vietnam and it was for the reasons outlined above that it was agreed a direct award to GAHP for a new contract in 25/26 was the appropriate and VfM way forward. The contract will use the latest agreed ODA template which is based upon FCDO legally approved wording to ensure the international nature of the transaction meet ODA standards.

VfM is an important aspect of Defra ODA programmes. A key aim of this project will be to ensure that it addresses priority issues on the management of pollution in LMICs. Through its approach, tested through primary evidence on the ground, evaluation against contributions to multilateral initiatives and addressing of evidence gaps, the goal of this project is to enhance our short- and long-term ability to assist LMICs in the most cost-effective and efficient ways of better managing air, chemical, plastic and waste pollution. There is a strong workplan and governance and reporting structure. GAHP will complete progress reports on a monthly basis which will be reviewed and discussed by the team and GAHP. The progress report will cover risks, issues, finances, delivery plan updates and output tracking.

Fraud Risk

Defra follows HMG best practice on avoiding fraud and corruption which is for all organisations to have a zero-tolerance approach to fraud and corruption. The review of our delivery partners confirmed that they have systems in place to detect and combat fraud and all programme science are required to complete mandatory counter fraud training annually. GAHP's anti-fraud code of conduct states the definition of fraud, outlines the organisation's ethical principles, details the reporting mechanism and confirmed a zero-tolerance approach. They also have wider anti-fraud systems and processes in place, include gaining assurance through a due diligence process for each vendor and specific anti-fraud clauses within each of their contracts. As such the programme is aligned with the Defra and HMG's expectations of a zero-tolerance approach to fraud.

Assurance will be gained through preventative and detective controls, such as sample checking of payments and expenditure. Project visits, verifying deliverables against workplans and querying unexpected or unusual transactions are also used to gain assurance that systems are operating effectively and detect fraudulent activity. See section f, 'Management Case', for additional detail on governance structures in place for the programme, particularly around workplans and financial reporting.

The programme acknowledges that a history of 'no fraud' is an indicator in itself that both the programme team and delivery partners need to strengthen detective controls, ensure reporting processes are clear and promote a counter fraud culture. A delivery chain map has been developed prior to funding being transferred. The programme does not fall under the definition of a grant.

e. Financial case

Summary of financial appraisal

The EPP was first established in 2021 with the programme delivering a successful scoping year with its own business case. Following the spending review the EPP was funded through Global Centre on Biodiversity and Climate (GCBC) and work covered under the GCBC business case.

The programme will take a multi-layered systems approach, aiming to reduce pollution, improve health and the environment and reduce the impact of the 'Triple Planetary Crisis' in SEA and SSA. The programme will continue and expand work on integrated pest management/pesticide use reduction, open burning/air pollution and sustainable waste management in Vietnam, and new programming in Uganda that will deliver work on sustainable waste management and pollution challenges, including air pollution. There will also be the establishment of regional fora to amplify the impact of our bilateral engagement in SEA and SSA. Additionally, the programme will cover delivery of work under the final year of UNECE's International Cooperative Programme ICP Vegetation (ICPVEG) contract and multi-lateral funding to continue to support to the existing Forum on International Cooperation on Air Pollution (FICAP).

As noted in the Economic Case above, there are VfM/funding beyond 25/26 issues to consider - these are laid out in detail there. The 'do the minimum' way forward would potentially entail seeking approval for spend of £2.5m, rather than the 'preferred way forward' for the full £3m that has been allocated.

This £3m CDEL/RDEL allocated spend for 25/26 for which approval is being sought will mean the programme can deliver on its objectives around reductions in chemical, waste, air and plastic pollution, improving human health and creating the conditions for improved prosperity and reducing poverty. The funding is available within existing 25/26 ODA budgets and agreed with finance colleagues. The programme will be 90% CDEL/10% RDEL and 100% ICF funded.

Project Summary (£m)	SOC	OBC	FBC
Total costs by case			
Defra Funding			3
Partnership funding			
Contributions			
Other sources			
Initial project costs			
Additional funding request in this case			3

Table 2 Financial summary

Annualised spend profile (£m)	Total
Project implementation costs	
Vietnam programme	£2,300,000
Uganda programme	£400,000
Regional Forum	£150,000 (£100,000 SEA, £50,000 SSA)
ICPVEG	£100,000
FICAP multilateral air pollution	£50,000
Project whole life costs	£3,000,000

Table 3 Project cost detail

Overall affordability

The ODA Hub and ODA finance business partner has confirmed there is sufficient ICF budget to cover the costs of this programme. A break down has been provided setting out the breakdown of costs across the project activities.

Accounting Officer Assessment

Expenditure is in accordance with relevant legislation, meets the standards in Managing Public Money, is judged to provide good value for money and can be delivered in the intended timescale so meets the five tests for the Accounting Officer assessment of regularity, propriety, value for money, affordability and feasibility. The assessment is available to see on request.

f. Management case

Project management

The main management mechanism will be the Monthly Progress Meeting attended by the Programme Responsible Owner and Project Lead in Defra and the GAHP project team along with other stakeholders as required. The purpose of the Monthly Progress Meeting is to:

- Review the programme tracker, as the Programme's main monitoring tool, on a monthly basis.
- Review the programme forecast, on a monthly basis.
- Review progress against the LogFrame, as the Programme's main evaluation tool, on a quarterly basis.
- Discuss project pipeline and opportunities.
- Identify key areas of progress made and potential risks, in order to escalate to the ODA Board, if appropriate.

There will also be monthly or bi-monthly (as required) meetings with the Defra teams delivering the ICPVEG and FICAP programmes to ensure coordination and project oversight.

Additionally, there will be a **Programme Board**, made up of officers from GAHP (the main Vietnam and Uganda delivery partner), representatives from the Defra teams delivering the ICPVEG and FICAP programmes and other relevant Defra policy teams to discuss and approve key deliverables, as well as identify lessons learnt. The Board will meet quarterly, be chaired by the programme SRO and will act as the main decision-making forum for the programme.

Programme SRO: Head of the International Hub in Chemicals, Pesticides and Hazardous Waste

- Overall responsibility for delivery of the project and ensuring coherence with Defra and HMG objectives.
- Provide scrutiny and approval of all required programme documentation and spend, in line with Defra internal processes.
- Represent the Programme at the quarterly Defra ODA Board, highlighting progress made and flagging any emerging risks.
- Ensure the impact of the Programme on gender equality receives ongoing consideration.

Programme PRO: Programme Manager for the Environmental Pollution Programme in Chemicals, Pesticides and Hazardous Waste

- Attend regular Programme Management meetings with the Programme SRO.
- Flag any emerging risks and issues to the Programme SRO and central Defra ODA Team.
- Ensure all proposed financial spend is conducted in accordance with the relevant internal Defra processes to ensure ongoing value for money.

- Ensure Programme SRO is briefed ahead of each ODA Board.
- Feed into future Spending Review / cross-government financial funding processes, as informed by the outcomes of the Programme's scoping phase.
- Monitor the implementation of Defra's ODA strategy and policy priorities.

Project Lead: Project Leads in Environmental Pollution Programme team, Chemicals, Pesticides and Hazardous Waste

- Work with GAHP Programme Officers and relevant Defra ICPVEG and FICAP teams to inform timing and structure of Project Board meetings, ensuring appropriate attendance from Defra stakeholders.
- Coordinate monitoring and evaluation through monthly inputs to the Programme Tracker from delivery partners, incorporating risks, issues, financial updates, progress updates as well as a general status update.
- Coordinate quarterly updates of the Log Frame.
- Coordinate the updating of financial forecasting and actual spend on basis of returns from delivery partners and Defra core spend.

Central Defra ODA Team:

- Set up regular check-ins with the EPP team to share information and provide advice.

ODA Finance Business Partner:

- Report spends from Delivery Partners to the ODA Board on a quarterly basis. Monthly reports of actual spend against the Programme's ODA Cost Code will be provided by the ODA Finance Manager.

Main Delivery Partner: GAHP

- The Programme Officers will work with the Defra programme team to inform timing and structure of Project Board meetings, ensuring appropriate attendance from GAHP stakeholders as appropriate.
- Provide inputs to the Programme Tracker on a monthly basis.
- Provide financial returns to ODA Business Partner on a quarterly basis.
- Provide input to monthly financial forecasting and updating of actual spend on a monthly basis.
- Provide quarterly inputs to the Log Frame.
- Work with Project Leads to identify and assess risks and opportunities and identify appropriate mitigations of risks.
- Provide options for further development of the programme, as required by the Spending Review and other bidding processes.
- Provide liaison with local country contacts for any project activity the Defra team require.

Evaluation

All Defra ODA programmes are designed to ensure that Defra ODA Monitoring and Evaluation activities are consistent with the requirements of the UK International Development Act 2015, while maximising opportunities for learning and providing accountability.

An end of programme evaluation will be commissioned to understand the programme's impact, value for money, and effectiveness. Where possible, this will be an independent evaluation, employing both quantitative and qualitative evaluation methods, to determine project performance and delivery against the expected outputs, outcomes, and impacts. The programme will explore whether an external evaluation, through services such as ITAD, would be feasible. This activity will take place in the final quarter, with findings becoming available shortly thereafter. Results can then be integrated into future programming to support continuous improvement and maintain the programme's adaptive nature.

The evaluation process will follow the UK Government's Magenta Book approach, ensuring robust and comprehensive evaluation design, conduct, and dissemination. Additionally, it will consider the OECD Evaluation criteria, reflecting on relevance, coherence, effectiveness, efficiency, impact, and/or sustainability.

Where relevant, we will build on evaluations delivered in previous years for the programme. EPP activities underwent an evaluation process at the end of year three (2024/25). Results from these will be analysed and recommendations incorporated where possible into the next phase of the programme. Indicative results have been largely positive, indicating positive change as a result of interventions through increased knowledge of open burning and pesticide use impacts, promotion of viable alternatives, and strengthened stakeholder awareness and capacity.

Risk, Issues, Dependency and Assumption management

The programme's governance structure ensures there is a continuous risk monitoring process supporting informed, risk-based decision making. A live risk register is used to track risks, issues and mitigations in place. Regular monitoring of risks and issues is conducted both informally through day-to-day management and formally through monthly reviews. The programme team meets with delivery partners on a monthly basis to assess the current risks and issues, review the risk register and provide progress updates on mitigating activities. High-level risks are escalated to the programme board, which meets on a quarterly basis.

Risk owners take prime responsibility for managing and reporting on key risks. The responsibility at board level is to take the risk challenge function role, being clear the risk is taken seriously and identify those that will prevent the EPP from delivering its targets by agreeing and reviewing the risk register. This includes regularly considering the range of risks that the programme is exposing itself to, ensuring that there is a well-judged balance between ambition and achievement. The Defra team, with the PMO, will ensure consistency across the projects in the way that risks are evaluated, mitigated and escalated/de-escalated.

Risk appetite is defined as the 'amount of risk to which the programme is prepared to accept, tolerate, or be exposed to at any point in time.' The statement and table below set out the risk appetite for the EPP.

The EPP programme is investing in managing and mitigating the impacts of environmental pollution in areas that are underfunded or where there is unmet need. As such the programme has a high risk-appetite for investing in innovative research and development that supports us to tackle complex global health challenges for the benefit of people in LMICs. This work also necessitates a high-risk appetite for innovative solutions and new ways of working, requiring flexibility in project delivery. The programme has a low risk appetite in relation to staff safety and security, ethical, safeguarding, and fiduciary risks.

Risk Category	Portfolio Risk Appetite	Programme Risk Appetite
Strategic and context	Open	Open
Delivery and Operational	Cautious	Cautious
Financial and fiduciary	Cautious	Cautious
Project / Programme	Open	Open
Reputational	Cautious	Cautious
Safeguarding	Cautious	Cautious

Key Risks and mitigations

Delivery

Delivery partner(s) not fulfilling commitments

Mitigation: The allocation apportioned to GAHP is on the basis of a contract, with the ability to negatively accrue or return any underspent funds to Defra. Funds will only be released to other contracted partners as contract deliverables are realised – we will reserve the right to hold payment in the event of non-contractual delivery. Where unexpected outside factors impact delivery, we will work closely with GAHP to ensure that the expected deliverables are met through alternative routes such as seeking opportunities to deliver through remote means where possible.

Pandemic, extreme weather or political turmoil causes disruption to on-the ground delivery and / or travel

Mitigation: Scenario planning, including contingency plans. Close liaison with FCDO colleagues in country will ensure up-to-date, local information is used to inform decisions. Seeking opportunities to deliver remotely where possible. Regular review during high risk periods e.g. Ugandan election in January 2026, wet season (March-May, September-November) in Uganda, typhoon season (August-September) in Vietnam, will ensure contingency plans can be put in place in a time-appropriate manner.

Funding not secured beyond 2025/26 (partially and fully)

Mitigation: Ensure that work conducted in Uganda, such as an assessment of current waste management strategies in the country and production of an HPAP, is produced by March 2026 and is a standalone document that is of use moving forward to stakeholders in the country. A similar approach could be taken with the establishment of the Regional Forum in Vietnam, with provision made in 25/26 to ensure it will be able to standalone and deliver benefits for stakeholders if funding for 26/27 and beyond is reduced or stops completely. This way forward will need to be discussed with GAHP as our delivery partner, making them aware of the risks around funding from 26/27.

This risk is also a reputational one but will not repeat below.

Reputational

Local delivery partners are unable to deliver / unreliable

Mitigation: Payment for work will be on the basis of locally negotiated MOUs, which will include key delivery milestones. We will reserve the right to restrict payment if local partners do not deliver on these milestones. Local partnerships will be selected on the basis of the insight from advisors on the ground. We will also continue to liaise closely with British Embassies and High Commissions.

Safeguarding

Inappropriate conduct by a UK or local delivery partner

Mitigation: Defra has a safeguarding policy in place. Key staff within Defra and GAHP will be made aware of the safeguarding guidance, and how to report any concerns through the Defra Safeguarding mailbox. GAHP will have confidential and accessible reporting mechanisms in place separate to Defra processes and this will be signposted to staff. Defra and GAHP risk registers have SEAH risk and mitigations, which are monitored and discussed regularly, and SEAH safeguarding training is available to Defra and GAHP staff members. Local advisors will be asked to consult with partners on the ground to ensure they have appropriate safeguarding measures in place. The funding agreement with GAHP will contain the latest agreed language on SEAH safeguarding.

Lessons learned are recorded in the delivery partner reporting pack, as part of the management exercise that is the Monthly Progress Meeting, as and when they arise. There will be a thorough project evaluation upon completion and ongoing assessment throughout.

g. Impact Assessment

Data Protection Impact Assessment

No data on participants in the programme will be collected.

The delivery partners meet the International Aid Transparency Initiative (IATI) standard that aims to ensure that organisations publish information to improve the coordination, accountability and effectiveness to maximise their impact on the world's poorest and most vulnerable people. This includes information on the organisation, funds, and planned activities. Significant outputs including log frames, annual reviews, programme/project proposals and technical reports which will be of interest to other countries and stakeholders are available and will continue to be so throughout the life of the programme. All outputs will be published on IATI. Relevant programme outputs are uploaded to the UK Development Tracker. Regular financial reporting forms are an important part of ensuring transparency across the programme and these are produced monthly for the Progress Meetings.

2.7 Recommendation

It is recommended that approval is granted for funding for the Environmental Pollution Programme for 25/26 to allow the programme to continue its work in reducing pollution, improving outcomes for health and the environment and creating the conditions for improved prosperity and reducing poverty.

ENVIRONMENTAL POLLUTION PROGRAMME (EPP) - THEORY OF CHANGE

To work with ODA-eligible regions, countries and low-income communities to manage, mitigate and reduce pollution. Work will increase resilience of people and the environment to the impact of the Triple Planetary Crisis.

