



Environmental & Social Management System (ESMS)

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Acronyms and Abbreviations

AFD	Agence Française de Développement (French Development Bank)
BMZ	Bundesministerium für wirtschaftliche Zusammenarbeit und Entwicklung (German Federal Ministry for Economic Cooperation and Development)
CCRF	Code of Conduct for Responsible Fisheries
CITES	Convention on International Trade in Endangered Species
E&S	Environmental & Social
EHS	Environmental, Health & Safety
ESA	Environmental and Social Assessment
ESIA	Environmental & Social Impact Assessment
ESF	Environmental & Social Framework
ESMP	Environmental & Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Safeguards
FAO	Food and Agriculture Organization of The United Nations
FPIC	Free, Prior, Informed Consent
H&S	Health & Safety
IFC	International Finance Corporation
ILO	International Labour Organization
IP	Indigenous Peoples
IUCN	International Union for Conservation of Nature
KfW	Kreditanstalt für Wiederaufbau (German Development Bank)
MPA	Marine Protected Area
NGO	Non-Governmental Organisation
OECD	Organization for Economic Cooperation and Development
OHS	Occupational Health & Safety
PCGC	Public Corporate Governance Codex of the German Federal Government
PS	Performance Standards (IFC)
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
VGGT	FAO Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security
VGSSF	FAO Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries



1 INTRODUCTION TO THE BLUE ACTION FUND'S ESMS

1.1 Objective and Purpose

A non-profit foundation based in Germany, the Blue Action Fund has government funding partners — Germany, through the German Federal Ministry for Economic Cooperation and Development (BMZ) in cooperation with KfW Development Bank; Sweden, through the Swedish Ministry for Foreign Affairs; and France, through the Agence Française de Développement (AFD). Within its nature of public funding Blue Action Fund endorses the development and implementation of an Environmental and Social Management System (ESMS) to assess and manage the environmental and social (E&S) impacts of its activities on affected communities and the environment in accordance with international standards and best practices.

This ESMS provides a description of processes of the ESMS to ensure that E&S topics are duly addressed as part of the Blue Action Fund's activities in line with the Performance Standards (PS) of the International Finance Corporation (IFC) and the Sustainability Guidelines of KfW Development Bank (2016). Successful implementation of this ESMS will therefore facilitate sound E&S management in line with the requirement of other International Finance Institutions requirements.

In conjunction with Blue Action Fund's Grant Procedures Manual, the ESMS defines procedures, tools and responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with projects supported by the Blue Action Fund throughout the entire project lifecycle, in line with its international and national requirements. The ESMS is intended to be a "living document" in the form that it is continually edited and updated to reflect latest experiences and learnings from ongoing projects.

The ESMS is applicable for all projects receiving funding from the Blue Action Fund. Projects can currently be divided into six main types, although some projects can be assigned to more than one type:

- Designation of new Marine Protected Areas (MPAs)
- Development of an effective management system for existing/new-established MPAs
- Implementation of improved nature conservation measures
- Development of alternative sustainable livelihoods
- Projects involving activities related to aquaculture
- Small-scale construction activities (e.g. ranger offices, research or monitoring facilities, jetty, fish processing or storage facilities, access roads, tourism facilities etc.)

1.2 ESMS Implementation Responsibilities

This section outlines the responsibilities of each involved party of this ESMS in achieving the E&S performance goals as set by the Blue Action Fund.

1.2.1 Blue Action Fund

By implementing the measures below, the Blue Action Fund will be able to provide evidence that best efforts are made to address E&S topics to the extent possible given the project/stakeholder setup, the nature of the projects and the context of the implementation.

The responsibility of Blue Action Fund, specifically of the Fund Management Team in cooperation with KfW's responsible environmental and social expert, is to:



- Set the standards that the grantee and its partners must implement in the funded projects;
- Ensure the grantees can apply the requirements of the ESMS by:
 - Considering E&S capacities (willingness, technical capacities, previous experience) during the selection of Implementing Partners;
 - Integrating E&S management clauses in the contractual documentation with the grantee;
 - Integrating E&S in the project selection criteria;
 - Raising awareness of grantees on E&S topics by addressing these topics in meeting between the Blue Action Fund and the grantees in the form of trainings based on real cases encountered in projects;
 - Integrating E&S criteria in the project monitoring process and providing ad-hoc support on the ground for grantees and their partners and contractors;
 - Offering support with regard to information on obligations of the grantees towards E&S legislation (including permitting, labour conditions, etc.);
 - Strengthening the capacities of the grantees regarding E&S Assessment conduction and mitigation measures implementation, including Occupational Health & Safety (OHS) trainings if requested.
- Monitor to what extent E&S risks are correctly assessed by the grantees at the planning/proposal stage and that subsequent E&S management activities are implemented per this ESMS;
- Monitor the Environmental & Social Management Plan (ESMP) implementation during all stages of the projects, including through site visits;
- Consolidate reporting on ESMS implementation;
- Collect project lessons learnt to adapt the requirements of this ESMS and its performance in the light of the field experiences.

1.2.2 Grantees

The grantees have the overall responsibility for E&S assessment and the management during the preparation and implementation phase of the project.

The responsibility of the grantees is to:

- Diligently implement the requirements of the ESMS;
- Ensure compliance with all relevant national legislation, as well as with the E&S controls and mitigation measures contained in the ESMP and associated documents;
- Ensure proper stakeholder engagement by:
 - Involving communities, authorities and other local stakeholders in the whole project life cycle, starting within the project conception and planning;
 - Acting as the point of contact for consultation and feedback to communities and authorities.
- Ensure that the design and planning comply with national requirements and aligns with international best practices;
- Raise awareness of its partners and contractors in the fields of E&S topics and within the general implementation of this ESMS;



- Monitor the E&S performance of its contractors and sub-contractors used for providing workforce, supplies and services;
- Disclose relevant E&S documents, taking into account data protection regulations;
- Report to the Blue Action Fund on topics including occupational health and safety incidents, accidents or best practices;
- Report to the Blue Action Fund on grievances and complaints issued by the public or other relevant stakeholders of the respective project.
- Report to the Blue Action Fund in case a project or an activity within a project has been stopped due to security risks of the workers, the beneficiaries or other stakeholder or due to reputational risk to the Blue Action Fund.
- The grantee should appoint at least one person for E&S monitoring who is familiar with Blue Action Fund's ESMS requirements. This person should be responsible for reporting to the Blue Action Fund on E&S topics.

1.2.3 E&S Operational Requirements for all Projects

The Blue Action Fund has set the following E&S operational requirements to its funded projects, within the constraints of the financial targets set:

- Screen all projects requesting funding by the Blue Action Fund against the Exclusion List;
- Screen all projects for E&S impacts and benefits prior to any funding;
- Define adequate management measures to avoid or mitigate potential environmental, social or climate impacts;
- Request projects to comply with national and international environment, social, health and safety regulations applicable to the financed projects;
- Work together with grantees via individual follow-up, to get them to consider project related E&S management risks in each project and, if such risks are identified, ensure that they are adequately addressed during the life cycle of the project;
- Implement and maintain an Environmental and Social Management System (ESMS) within Blue Action Fund to deliver the commitments under this policy and to monitor alignment with this policy across the project portfolio;
- Plan, implement and document stakeholder engagement activities as an ongoing process for all projects;
- Implement a formalised process to capture and manage project-related complaints from communities, workers and other stakeholders (i.e. a Grievance Mechanism); and
- Communicate Blue Action Fund's E&S principles to external stakeholders.

2 EXCLUSION LIST

The Blue Action Fund Exclusion List is based on

- (1) the International Finance Corporation (IFC) Exclusion List, and
- (2) the Exclusion List of the Agence Française de Développement (AFD) Group in Foreign Countries.

Blue Action Fund will not engage with activities involved with the intentional degradation of the natural environment and the production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements, or subject to international bans. Blue Action Fund will therefore not financially support production or sale of any illegal product or unlawful activity under the laws of the host country or laws of its funders or



under international regulations, conventions and/or agreements. Also, it will not support any sector or any service subject to an embargo by the United Nations, European Union and/or its funders in a particular country and with no absolute or relative restriction regarding the amount.

2.1 Environmental Activities

- New land use on nationally or internationally protected areas.
- Any operation leading to or requiring the destruction¹ of a critical habitat², or any forestry project which does not implement a plan for improvement and sustainable management.
- Trade in animals, plants or any natural products not complying with the provisions of the CITES convention.³
- Drift net fishing in the marine environment using nets in excess of 2.5 km in length.
- Poaching / illegal hunting.
- Commercial logging operations for use in primary tropical moist forest.
- Production or trade in wood or other forestry products other than from sustainably managed forests.
- Exploitation of diamond mines and marketing of diamonds where the host country has not adhered to the Kimberley Process.

2.2 Social Activities

- Activities involving harmful or exploitative forms of forced labour⁴ or harmful child labour⁵.
- Projects that include involuntary physical displacement and/or forced eviction.
- Production or activities that impinge on the lands owned, or claimed under adjudication, by Indigenous Peoples, without full documented consent of such peoples.
- Activities that would damage cultural properties, such as archaeological and historical sites, religious monuments or cemeteries.

2.3 Other Activities

- Production, use or trade of pharmaceuticals, pesticides/herbicides, ozone layer depleting substances⁶, any dangerous materials such as asbestos or products containing PCB's⁷, wildlife or products regulated under CITES.

¹ Destruction means (1) the elimination or severe reduction in the integrity of a habitat caused by a major and long-term change in land-use or water resources or (2) the modification of a habitat such that this habitat's ability to fulfil its role is lost.

² The term critical habitat encompasses natural and modified habitats that deserve particular attention. This term includes (1) spaces with high biodiversity value as defined in the IUCN's classification criteria, including, in particular, habitats required for the survival of endangered species as defined by the IUCN's red list of threatened species or by any national legislation; (2) spaces with a particular importance for endemic species or whose geographical range is limited; (3) critical sites for the survival of migratory species; (4) spaces welcoming a significant number of individuals from congregatory species; (5) spaces presenting unique assemblages of species or containing species which are associated according to key evolution processes or which fulfil key ecosystem services; (6) and territories with socially, economically or culturally significant biodiversity for local communities. Primary forests or high conservation value forests must also be considered as critical habitats.

³ [CITES: Convention on International Trade in Endangered Species of wild fauna and flora threatened with extinction \(Washington, 1993\)](#)

⁴ Forced labour means all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty.

⁵ Harmful child labour means the employment of children that is economically exploitive, or is likely to be hazardous to, or to interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

Employees must be at least 14 years of age, as defined in the ILO's Declaration on the Fundamental Principles and Rights at Work (C138 – Minimum Age Convention, Article 2), unless local laws require compulsory school attendance or a minimum working age. In such circumstances, the highest age requirement must be used.

⁶ Any chemical component which reacts with, and destroys, the stratospheric ozone layer leading to the formation of holes in this layer. The Montreal Protocol lists Ozone Depleting Substances (ODS), their reduction targets and deadlines for phasing them out.



- Production, use or sale of pharmaceutical products, pesticides/herbicides, ozone layer depleting substances⁶ or any other dangerous substances that are banned or are being progressively phased out internationally.
- Production or trade of arms, ammunition, weaponry, controversial weapons.⁸
- Procurement of firearms.
- Production or trade of strong alcohol intended for human consumption or other alcoholic beverages (excluding beer and wine).⁸
- Production or trade of tobacco.⁸
- Gambling, gaming establishments, casinos or any equivalent enterprises and undertaking.⁹
- Any trade related to pornography or prostitution.
- Production or trade of radioactive materials. This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where IFC considers the radioactive source to be trivial and/or adequately shielded.
- Production or trade in unbonded asbestos fibers. This does not apply to purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%.
- Production, trade, storage, or transport of significant volumes of hazardous chemicals, or commercial scale usage of hazardous chemicals. Hazardous chemicals include gasoline, kerosene, and other petroleum products.
- Transboundary trade in wastes, except for those accepted by the Basel Convention and its underlying regulations.¹⁰
- Any activity leading to an irreversible modification or significant displacement of an element of culturally critical heritage.¹¹
- Production and distribution, or investment in, media that are racist, antidemocratic or that advocate discrimination against a part of the population.
- Large-scale property / real estate development, commercial construction.

2.4 Category A Projects

Category A projects have potential significant adverse environmental and social impacts require a full bankable environmental and social impact assessment (ESIA).¹² It is assumed that Category A projects, which usually consist of big construction projects, are very unlikely to apply for funding by the Blue Action Fund. As a general rule, Category A projects are thus excluded from funding by the Blue Action Fund for budget and time reasons. If the Blue Action Fund deems a project worthy of funding, relevant units of all of its funders need to give its approval.

⁷ PCBs (polychlorinated biphenyls) are a group of highly toxic chemical products that may be found in oil-filled electrical transformers, capacitors and switchgear dating from 1950 to 1985.

⁸ This does not apply to project sponsors who are not substantially involved in these activities. "Not substantially involved" means that the activity concerned is ancillary to a project sponsor's primary operations.

⁹ Any direct financing of these projects or activities involving them (for example, a hotel including a casino). Urban improvement plans which could subsequently incorporate such projects are not affected.

¹⁰ Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their disposal (1989).

¹¹ Critical cultural heritage" is considered as any heritage element recognised internationally or nationally as being of historical, social and/or cultural interest.

¹² [KfW Sustainability Guideline \(2016\): Assessment of Environmental, Social, and Climate Performance: Principles and Process](#), p. 8ff.



3 E&S STANDARDS AND REQUIREMENTS

3.1 National Standards

All project activities financed and supported by Blue Action Fund need to be compliant with provisions of legal framework of the host countries of the projects.

The grantees commit to achieve and demonstrate compliance with national legislation and other obligations (e.g. environment, health, safety & labour laws, construction and operation permits etc.) by signing a Declaration of Undertaking, which forms part of the grant agreement.

3.2 International Standards

The following international standards, guidelines and principles are applicable to all projects financed by the Blue Action Fund and should thus be acted upon by the Blue Action Fund and its grantees respectively:

- BMZ's Guidelines on Incorporating Human Rights Standards and Principles, Including Gender, in Programme Proposals for Bilateral German Technical and Financial Cooperation.¹³
- KfW Sustainability Guideline - Assessment of Environmental, Social, and Climate Performance: Principles and Process.¹⁴
- ILO Core Labour Standards (the core labour standards consist of five standards, laid out in eight conventions).¹⁵
- IFC Environmental and Social Performance Standards (PS)¹⁶
 - PS1: Social and Environmental Assessment and Management Systems
 - PS2: Labour and Working Conditions
 - PS3: Resource Efficiency and Pollution Prevention
 - PS4: Community Health, Safety and Security
 - PS5: Land Acquisition and Involuntary Resettlement
 - PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
 - PS7: Indigenous Peoples
 - PS8: Cultural Heritage
- The World Bank Environmental and Social Framework (ESF): Environmental and Social Standard (ESS) 5 Land Acquisition, restrictions on Land Use and Involuntary Resettlement¹⁷
- The World Bank Group's Environmental, Health and Safety (EHS) Guidelines, including General EHS Guidelines and Industry Specific Guidelines, as applicable.¹⁸
- FAO Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (VGGT).¹⁹

¹³ [German Federal Ministry for Economic Cooperation and Development \(BMZ\) - Guidelines on Incorporating Human Rights Standards and Principles, Including Gender, in Programme Proposals for Bilateral German Technical and Financial Cooperation.](#)

¹⁴ [KfW Sustainability Guideline \(2016\)](#)

¹⁵ [International Labour Organization \(ILO\): Introduction to International Labour Standards - Conventions and Recommendations,](#)

¹⁶ [International Finance Corporation \(IFC\): E&S Performance Standards \(2012\)](#)

¹⁷ For (economic) displacement-impacts due to the establishment/management of protected areas (loss/limitation of access to natural resources) ESS 5 has to be applied.

¹⁸ [International Finance Corporation \(IFC\) – World Bank Group: Environmental, Health, and Safety \(EHS\) Guidelines.](#)

¹⁹ [Food and Agriculture Organization of the United Nations \(FAO\): Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security \(VGGT\).](#)



- FAO Code of Conduct for Responsible Fisheries (CCRF).²⁰
- FAO Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries (VGSSF).²¹
- For resettlement aspects, which are not already covered by the Exclusion List (chapter 2), the UN Basic Principles and Guidelines on Development-based Evictions and Displacement (namely §§ 42, 49, 52, 54 and 60)²² have to be complied with (in addition to national legislation and international safeguard requirements).
- For workers' accommodation (in case of construction activities), Blue Action Fund's projects should adhere to international standards for worker housing such as "Workers' Accommodation: Processes and Standards: A Guidance Note by IFC and the EBRD".²³
- UN Code of Conduct for Law Enforcement Officials²⁴
- Basic Principles on the Use of Force and Firearms by Law Enforcement Officials²⁵

An overview of the applicable International Environmental and Social Standards and Guidelines with short summaries can be found in Annex A.

²⁰ [Food and Agriculture Organization of the United Nations \(FAO\): Code of Conduct for Responsible Fisheries \(CCRF\).](#)

²¹ [Food and Agriculture Organization of the United Nations \(FAO\): Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries \(VGSSF\).](#)

²² [United Nations \(UN\): Principles and Guidelines on Development-based Evictions and Displacement.](#)

²³ [International Finance Corporation \(IFC\) & European Bank for Reconstruction and Development \(EBRD\): Workers' accommodation: processes and standards - A guidance note by IFC and the EBRD](#)

²⁴ <https://www.ohchr.org/Documents/ProfessionalInterest/codeofconduct.pdf>

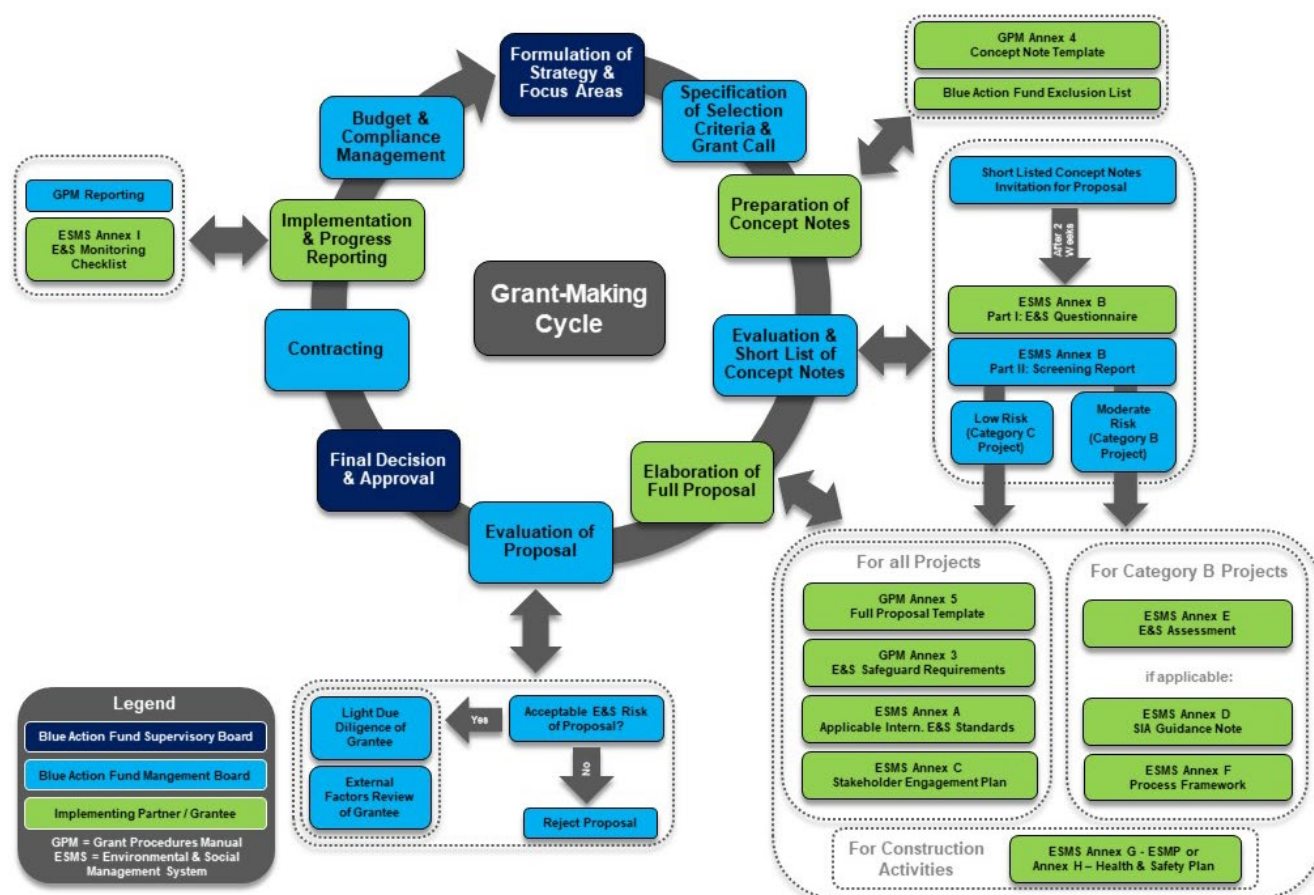
²⁵ <https://www.ohchr.org/Documents/ProfessionalInterest/firearms.pdf>



4 RISK MANAGEMENT PROCESS WITHIN THE BLUE ACTION FUND'S ESMS

A key principle of the E&S risk management process is incorporating E&S concerns as an intrinsic part of project cycle management. Each step of the project life cycle provides opportunities to address E&S requirements to achieve good E&S performance in the projects.

The graphic below summarizes the E&S risk management process implemented by Blue Action Fund. The process is further described in the subsequent sections.



4.1 Step 1: Project & Grantee Appraisal

Blue Action Fund's eligibility requirements concern the project content ("what"), project approach ("how") and the grantee ("who"). Applicants should consider carefully if they fulfil the criteria and have the capacity to offer and implement projects.

All grants projects must undergo an initial E&S assessment process that is composed of the following three steps, which are individually explained in more detail below.

- Screening: Preliminary appraisal, called 'Screening', aims at determining the environmental, climate and social relevance of a project. All projects are classified into one of the following three categories according to the relevance of their potentially negative E&S impact:
 - Category C – low risk projects;

- Category B – medium risk projects; or
- Category A – high risk projects (only to be financed by the Blue Action Fund, if approved by the funders of Blue Action Fund).
- Scoping: For projects, involving medium E&S risks (Category B), during the Scoping stage the appropriate scope of future environmental and social assessment is determined to identify and assess the project's environmental, climate and social consequences and risks more accurately.
- Assessment: Based on the results of the screening and scoping an Environmental & Social Assessment (ESA) or an Environmental & Social Impact Assessment (ESIA) or further studies is required.

4.1.1 E&S Screening and Project Categorization

As part of the Blue Action Fund application process, all prospective projects have to undergo an initial E&S screening process to determine the project category.

Annex B provides an E&S Questionnaire & Screening Report for the high-level identification of relevant E&S risks and gives guidance on the project categorization. Annex B consists of Part I (Questionnaire, to be filled out by the Grantee) and Part II (Screening Report, to be filled out by the Blue Action Fund)²⁶.

The Grantee, whose concept notes have been shortlisted, has to complete & submit the E&S Questionnaire (Annex B - Part I) shortly after the invitation for proposal, which will then be reviewed by the Blue Action Fund's E&S responsible personnel.

The Blue Action Fund will verify that the project proposed by the Grantee does not include criteria that would place it on the Blue Action Fund Exclusion List and prepare the E&S Screening Report (Annex B – Part II), which will classify projects according to their potential environmental and social adverse impacts in either Category A, Category B or Category C, per the following definitions:

- Category C projects:
 - Minimal or no adverse environmental or social risks and/or impacts.
- Category B projects:
 - Potentially limited adverse environmental or social risks and/or impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures.
 - Category B projects should, as a minimum, undergo an “Environmental and Social Assessment” (see E&S Assessment Template in Annex E) for the identified risks and areas/topics of concern. If the impacts are expected to be solely social (e.g. livelihood impacts due to access restriction), a social impact assessment should be conducted. Annex D provides a Social Impact Assessment (SIA) Guidance Note.²⁷
 - An E&S Assessment is foreseen to capture the essential E&S risks but at the same time to be achievable within Blue Action Fund's time and budget constraints.
 - An E&S Assessment is focused solely on the specific E&S risks flagged and fit-for-purpose to formulate appropriate mitigation measures for the project-specific

²⁶ Annex B is in large parts based on IUCN's “ESMS Questionnaire & Screening Report – for field projects”.

²⁷ The SIA Guidance Note is taken from the IUCN ESMS



Environmental & Social Management Plan (ESMP). Annex G contains an ESMP that can also be used as a template to formulate more project-specific ESMPs.

- In case of involuntary access restriction in protected areas, which triggers World Bank ESS 5, a Process Framework (see Annex F) has to be prepared.
- Category B projects must implement mitigation measures as foreseen in project-specific ESMPs, tailored to the identified impacts and receptors.
- Category A projects (normally excluded from funding by the Blue Action Fund, unless approved by funders to the Blue Action Fund):
 - By definition Category A projects have diverse significant adverse E&S risks and impacts. General triggers of Category A can be of complex nature, a large to very large scale, the sensitivity of the location of the Project or the irreversibility of the impacts.

The table below gives examples of the expected E&S categorization for the project portfolio of the Blue Action Fund depending on the project type. However, each project has its own unique E&S characteristics, often depending on the location of the project, and as such the below table can only provide general guidance and is provided as illustrative examples only. Projects have to be categorised according to the E&S risks as identified within the E&S Questionnaire & Screening Report.

Category C - Low E&S Risk	Category B - Medium E&S Risk	Category A - High E&S Risk
- Low spatial requirements - No or negligible adverse environmental impacts - No adverse impacts on people - No access restriction to resources or loss of livelihoods - Small-scale construction - Small number of workers involved	- Potential adverse environmental impacts (including impacts on fish, corals, marine habitat) - Limited physical or economic displacement - Access restriction to resources or loss of livelihoods - Potential impacts on cultural heritage or Indigenous Peoples - Medium-scale construction	- Adverse environmental and social impacts - Involuntary physical or economic displacement of people - Adverse impacts on cultural heritage or Indigenous Peoples

4.2 Step 2: E&S Risk Assessment

4.2.1 Potential E&S Impacts and Risks

Although it is expected that the overall impacts of the Blue Action Fund projects (assumed to be mostly Category C projects) will be largely positive, risks and adverse impacts are not to be neglected. The typical risks and impacts that are anticipated in the vast majority of the Blue Action Fund projects are mentioned below:

- Impacts due to the siting of the projects;
 - Impacts on land take or by restriction of access to terrestrial or marine natural resources (threats to livelihood);
 - Impacts on terrestrial or marine natural habitats and or flora/fauna; or
 - Impacts on cultural heritage.
- Impacts on workers' health and safety (occupational health & safety) during construction activities, ranging from minor injuries to fatal accidents (e.g. boating accidents involving drowning of crew members).
- Impacts on labour conditions during construction activities. Such impacts might include, but are not limited to:
 - Employment of children as per ILO Conventions (child labour);



- Remuneration non-compliant to legal requirements; non-transparent remuneration;
- Harassment, intimidation, and/or exploitation of workforce (forced labour);
- Discriminations toward the workers due to origin, gender, age, ethnicity or any other criteria non-related to job.
- Impacts on the community, particularly linked to
 - Impacts by a change to or a loss of current types of livelihoods;
 - Accidents on open construction sites on which the access to community is not appropriately restricted;
 - Impacts related to tourism;
 - Disturbances to the workforce or to the community due to exposure to construction-related noise, vibration, dust etc.

4.2.2 Avoiding Impacts through Careful Project Design

Many impacts can be avoided if a project is planned and designed carefully, and considers E&S aspects within its conception. The following points will form part of basic considerations:

- Plan projects carefully in order to avoid:
 - Economic displacement of persons (direct take or access restriction to land, fishing grounds and other resources used for livelihood);
 - Forests, protected areas or ecologically sensitive areas;
 - Locations prone to natural disasters;
 - Socially, culturally or historically sensitive areas (e.g. places of worship).
- Give priority to use of local resources /materials to avoid construction traffic and associated impacts to the communities.
- Optimize use of natural resources (material, water, land) as much as possible.

4.2.3 Risk Assessment for Category C Projects

Category C projects usually do not require a further specific E&S assessment. However, if small construction is part of the project (e.g. ranger office, access road, jetty or facilities of similar scope, especially if located in a (marine) protected area), the grantee is required to have their contractors implement at a minimum the ESMP for Small Construction (Annex G) and to report to the Blue Action Fund on measures taken to enforce risk management. The implementation of the Small Construction ESMP should take the following aspects into account:

- Should the grantee consider that the ESMP does not adequately cover all of the risks, additional measures must be considered and appointed.
- Should any of the mitigation measures in the Small Construction ESMP (Annex G) be considered as not applicable or not relevant for a given project, the grantee should communicate the reasons, agree with the Blue Action Fund and document in writing their non-application.

In case of minor construction activities (e.g. using tools, setting up a bench, working on water or in hot environments) the Health & Safety Plan for Minor Construction Activities (Annex H) can be used instead of the ESMP in Annex G.

4.2.4 Risk Assessment for Category B Projects

For Category B projects, involving medium E&S risks, the appropriate scope of the subsequent E&S assessment is initially determined through the E&S Questionnaire & Screening Report. In this process the project's E&S impacts and risks are initially identified, which will need to be



further assessed during the “Elaboration of Full Proposal” phase through a separate E&S Assessment.

Exceptions to the E&S Assessment process can be provided:

- If local legislation requires a full ESIA or similar document, the grantee has to comply with this obligation and undergo the national ESIA process.
- If the proposed project is part of a local/regional development plan or a wider program for which an ESIA is available, the E&S Assessment obligation can be waived if the available ESIA appropriately addresses the identified risks.

Given that projects are intended to be beneficial for the environment as well as for communities the E&S risks for Category B projects are expected to be limited and therefore can be subject to an E&S Assessment or a partial Environmental & Social Impact Assessment (ESIA), rather than a full ESIA, which is usually required. A respective E&S Assessment Template is provided in Annex E.

It is the responsibility of the grantee to complete the E&S Assessment within a scope agreed with the Blue Action Fund and to submit the document to the Blue Action Fund. The grantee shall mobilize adequately qualified E&S personal (either in-house or externally recruited) to elaborate the E&S Assessment. Blue Action Fund shall review and validate the scope and results of the E&S Assessment.

The purpose of the E&S Assessment is to confirm the initially determined scope and possibly identify further negative E&S impacts of the project that are most important for design, decision-making and stakeholder interest and to propose appropriate mitigation measures. The E&S Assessment can also highlight positive impacts created by the project. The content of the E&S Assessment is, however, to be adapted to the categorization criteria that trigger the “B” categorization of the project.

The outcome of the E&S Assessment can be

- Modifications in the project design, such as change in project routing/siting to avoid risks/impacts.
- Rejection of the project (design), due to unbearable environmental and/or social impacts.
- Production of an ESMP that will be used to manage, monitor and respond to E&S impacts.

4.2.5 Access Restriction

Projects funded by the Blue Action Fund are likely to impose access restriction for communities. Projects are expected to create new marine protected areas (MPAs), extend MPAs, and/or increase enforcement of regulations within a MPA.

Access restriction can have positive effects (e.g. increase of fish populations inside zones with access, spill-over effects outside the no-take zone) and negative effects (e.g. reduced catch for fisheries within the access restriction zone, increased costs to reach other fishing zones).

A process framework needs to be prepared when Blue Action Fund projects may cause involuntary restrictions in access to natural resources in legally designated parks and protected areas. The purpose of the process framework is to establish a process by which members of potentially affected communities participate in design of project components, determination of measures necessary to achieve the objectives of World Bank ESS 5, and implementation and monitoring of relevant project activities. Annex F contains guidance for preparing a Process Framework and recommendations for the development of Livelihood Restoration Plans, in case the access restrictions lead to loss of livelihoods.



In case of voluntary access restrictions for communities (e.g. seasonal restrictions to collectively used resources), the participatory process needs to be described and well documented in order to demonstrate that the restrictions are voluntary. This should be done as part of the SEP, with meeting minutes, agreements, development plan and other documentation and, if necessary, e.g. in case of (temporary) loss of livelihoods, with the outline of mitigation measures in a management or action plan. Voluntary access restrictions will be collectively decided by the communities themselves. The decisions will be entirely voluntary and do not imply any change of community rights to these resources. The decision-making process has to reflect voluntary, informed consensus and also needs to include vulnerable groups (e.g. women, elderly, youths).

4.2.6 Involuntary Displacement

Blue Action Fund projects are generally not expected to cause physical displacement (loss of residential housing) or economic displacement (loss of land, loss of livelihoods, loss of access to natural resources). In case this occurs voluntarily (e.g. willing-buyer willing-seller) and on a limited scale, a Resettlement Action Plan or Livelihood Restoration Plan or similar document will have to be prepared.

4.3 Step 3: Environmental and Social Management Plans (ESMPs)

The purpose of an Environmental and Social Management Plan (ESMP) is to assist the grantees in avoiding and mitigating negative E&S impacts throughout the project lifecycle of a project. Informed by the Environmental and Social Assessment, the ESMP captures the environmental and social impacts and associated mitigation measures that need to be considered. The Grantee will oversee and monitor the ESMP implementation and will have ultimate responsibility for it.

4.3.1 Mitigation Measures for Small Construction Activities

This sub-section describes the minimum mitigation measures that need to be implemented in case a project includes any kind of construction activities. It is complemented by the Annex G, which provides an ESMP for Small Construction. While additional measures might need to be considered and included within the ESMP, this section highlights the most relevant measures.

In case of minor construction activities (e.g. using tools, setting up a bench, working on water or in hot environments) the Health & Safety Plan for Minor Construction Activities (Annex H) can be used instead of the ESMP (Annex G).

Labour Conditions

All projects must achieve compliance with international labour standards (ILO Core Labour Standards²⁸). Therefore, the following minimum standards have to be observed in all projects funded by the Blue Action Fund:

- Children below 15 years cannot be employed if the work prevents them to fully attend to school. Cumulated school and work time including transportation should not exceed 10 hours a day;
- Young workers below 18 years cannot perform work at night and tasks that are likely to jeopardise their health, safety or morals;
- All work shall be remunerated under the principle "equal pay for equal work" under the applicable remuneration standards of the project country;

²⁸ [ILO core labour standards](#)



- Employment relationships shall be based on principles of equal opportunity, fair treatment, and non-discrimination (e.g. due to gender, age or origin);
- Generally, contribution from community in the form of labour is allowed, provided that contribution is voluntary and does not negatively affect livelihoods;
- Forced labour, including prison work, is not tolerable;
- All workers must have access to a grievance mechanism, which guarantees anonymity;
- Workers of any kind must be provided with acceptable housing conditions ensuring the provision of adequate space, supply of water, adequate sewage and garbage disposal system, appropriate protection against heat, cold, damp, noise, fire, security and disease-carrying animals, adequate sanitary and washing facilities, ventilation, cooking and storage facilities and natural and artificial lighting;
- Workers of any kind must have access to emergency medical services. As a minimum, the construction sites must have first aid kits available and provide information on nearest medical facilities including emergency contact and mean of transportation.
- For community contributions to project labor, occupational health and safety, insurance provisions and other relevant provisions related to work undertaken must be covered.

Grantees will give priority on local communities to provide unskilled workers and skilled workers (subcontractors), if available, to encourage social growth and development in the project area. Recruiting policies and procedure will be clear to prevent claim and conflicts.

Occupational Health & Safety

If applicable, the grantee and its contractors are responsible for providing training to all workers on site regarding Occupational Health & Safety (OHS) related issues, so that workers can understand work hazards and protect themselves and others. The training will be tailored to the risks and be provided at a minimum before the workers begin with the work and whenever new risks are identified. The training will address the main risks on workers' health and safety related to work place, the safe work practices, the emergency procedures and the requirement of incident reporting. As a good practice, OHS training will be documented (signed attendance lists bearing as a minimum date and training topic) and be available for inspection by labour authorities and the Blue Action Fund, if requested.

Should the contractor have no capacities to provide this training, the grantee will find an alternative solution to ensure the workers are appropriately trained.

The grantees and their contractors are also responsible for providing personal protective equipment tailored to the occupational hazards. Exposition to severe worker's risks will lead to immediate work interruption until the exposition to hazard is brought to a reasonable level. A set of emergency preparedness and response measures, as appropriate for the respective risk level of a given intervention, shall complement the provisions for occupational health and safety.

The grantee has to establish adequate working incident reporting procedures (fatal accidents, medical treatment cases; first aid cases; restricted work injuries; near misses; environmental events; security and safety events). The idea behind incident reporting is to communicate the Health and Safety (H&S) event to achieve a continuous improvement in the H&S practices and reduce the risk of incidents across Blue Action Fund projects.

4.4 Step 4: Stakeholder Engagement

Stakeholder engagement refers to an ongoing process of sharing information and knowledge, seeking to understand and respond to the concerns of others, and building relationships based on collaboration. Stakeholder consultation and disclosure are key elements of engagement and



essential for delivery of successful projects. All projects funded by the Blue Action Fund are expected to have a heavy component of community engagement, activities and programmes.

Regarding public information and disclosure of E&S information, this ESMS is available on the BAF website. In addition, relevant environmental and social documentation of sub-projects will be made available on the BAF website timely. For GCF funded sub-projects, relevant time lines set for public disclosure as per GCF information disclosure policy²⁹, will be met diligently for all required E&S documentation of the respective sub-project.

4.4.1 Purpose

The overall aim of the Stakeholder Engagement process is to ensure that a timely, consistent, comprehensive, coordinated and culturally appropriate approach is taken to consultation and project disclosure. It is intended to demonstrate the commitment of the Blue Action Fund to an international best practice approach to engagement. In this context, good stakeholder relations are also a prerequisite for a good risk management. Specifically, the purpose of stakeholder consultation is to:

- Inform: by promoting stakeholder understanding of issues, problems, alternatives, opportunities and solutions through balanced and objective information sharing;
- Consult: by obtaining feedback and acknowledging concerns and aspirations of stakeholders on analysis, alternatives, and decisions with regard to development projects;
- Engage: by working directly with stakeholders to ensure that their concerns and aspirations are understood and considered and to assure them that their concerns / aspirations would be directly reflected in the developed alternatives; and that feedback will be provided on how their input influenced the final decisions;
- Empower: by making stakeholders partners in each aspect of the decisions, including development of alternatives and identification of preferred solutions.

4.4.2 Stakeholders

The term “Stakeholders” refer to persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. In this context, stakeholders may include:

- Persons living in the vicinity of a project site or using the present natural resources (locally affected villagers, community members);
- National or local government authorities involved in the development planning, having an interest in the project (medical /education authority) or delivering construction/operation authorisations and permits;
- Traditional/informal authorities or social and religious leaders;
- Civil society organizations and groups with special interests, the academic community, or other businesses;
- Parties involved in the project implementation (consultants, contractors, workers, employees);
- Vulnerable minorities/indigenous people as per IFC PS 7 definition that may be present in the project area and affected by the project. In the IFC PS 7 the term “Indigenous

²⁹ https://www.greenclimate.fund/documents/20182/574763/GCF_policy_-_Information_Disclosure_Policy.pdf/eca387d2-06b3-42c9-89f9-4976f2e802f4



Peoples” is used in a generic sense to refer to a distinct social and cultural group possessing the following characteristics in varying degrees:

- Self-identification as members of a distinct indigenous cultural group and recognition of this identity by others;
- Collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories;
- Customary cultural, economic, social, or political institutions that are separate from those of the mainstream society or culture; or
- A distinct language or dialect, often different from the official language or languages of the country or region in which they reside.

4.4.3 Implementation

The grantee needs to engage with the persons living in the area around the project site (including neighbours, local decision makers or community-based organisations) early in the planning process and throughout implementation / construction activities to inform them about the planned measures and also seek for their feedback around potential sensitivities.

Stakeholder engagement needs to be documented by the grantee in the form of minutes of meetings, and attendance lists. A template document of a Stakeholder Engagement Plan (SEP) for Blue Action Fund’s projects is provided in Annex C. This SEP template also includes a template for a Stakeholder List and a Public Grievance Form. In case of Indigenous Peoples being affected by the Project, the principle of free, prior and informed consent (FPIC) needs to be addressed in the Stakeholder Engagement Plan.

The grantee will conduct site visits and discussions with the local population throughout the design and planning phase. This will improve social acceptance, “ownership” and increase the chances of success of the project. It is important not to raise unrealistic expectations among the population: clarity will be made on critical topics that can influence social acceptance of a project, such as employment/business opportunities or costs of use of provided infrastructure.

A Grievance Mechanism shall be available for workers and the public during the planning phase already (see next section).

4.4.4 Grievance Mechanism

The purpose of the Grievance Mechanism is to implement a formalised process (identification, tracking and redress) to manage project-related complaints from communities, workers and other stakeholders. A Grievance Mechanism needs to ensure that stakeholder comments, suggestions and objections are captured and considered. The outline for a Grievance Mechanism can be found in Annex C.

A grievance is defined as an issue, concern, problem or claim (perceived or actual) that an individual or community group wants the grantee, its contractor or the Blue Action Fund to address and resolve, e.g.

- Specific complaint about impacts, damages or harm caused by the project;
- Concerns about project activities during construction or operation, or perceived incidents or impacts.

The Grievance Mechanism should also consider positive feedback and suggestions. The Grievance Mechanism is required to be:

- Systematic: All forms of complaints related to the project need to be considered;



- **Transparent:** Stakeholders must be informed that a grievance mechanism is in place, grievances must be documented and registered;
- **Appropriate:** Tailored to the project scope, adapted to local conditions and culturally acceptable; and
- **Lead to corrective actions:** Grievances must be answered as relevant and the answers must be documented. Timely resolution of grievances is vital to ensure successful implementation of the project.

The grantee is responsible to implement a formal grievance mechanism that addresses the requirements described and that can be accessed at any moment by the Blue Action Fund. In the event of serious complaints or those that cannot be resolved promptly, the grantees are obligated to inform the Blue Action Fund of the details. In addition, Blue Action Fund maintains a separate channel of communication open to local stakeholders in the event that issues are not being properly addressed by the grantees. The BAF's own institutional GRM will be in place by start of Q2, 2020. For the time being, KFW's Institutional Grievance Mechanism will be the key channel for grievance management³⁰. Responsible persons for grievance management at KFW are the Complaints Management Team³¹, the responsible KFW Project Manager and the responsible KFW Environmental and Social Expert. Responsible for grievance management at the Blue Action Fund is the Fund Management Team.

The Grantees should appoint one person as grievance mechanism manager (usually the implementation supervisor) who will inform colleagues and contractors about grievance mechanism procedures, gather grievance forms, report them to the grievance register and provide input to the project reporting to Blue Action Fund. The stakeholders must be informed on the existence of such grievance mechanism and the grantees must ensure that the process is considered by stakeholders to be culturally appropriate, trustworthy and effective.

Grievances might be formulated in an informal way (not necessarily written complaint) during a conversation, therefore grantee's employees need to be sensitized on this system. All grievances must be documented by the grantee's employees and sent to the grievance mechanism manager and consigned within a grievance log (paper or electronic).

The grievance log should at least include the following categories:

- Name and contact details of contact (unless requested to remain anonymous);
- Date and description of grievance;
- Response made to the grievance / corrective action implemented.

4.5 Step 5: E&S Monitoring and Reporting

Blue Action Fund maintains a two-tier system for monitoring and documentation of the ESMS implementation:

- **Primary Monitoring:** Responsibility of the grantee;
- **Secondary Monitoring:** Responsibility of the Blue Action Fund and its (funding) partners

The monitoring and documentation consists of reports (e.g. Stakeholder Engagement Plan, Management Plans etc.) provided by the grantee (direct/primary monitoring) and monitoring

³⁰ <https://www.kfw-entwicklungsbank.de/International-financing/KfW-Development-Bank/KfW-Development-Finance-Complaint-form.html>

³¹ FZ_Complaints@kfw.de



visits performed by Blue Action Fund and its advisors (indirect/secondary monitoring). As a standard, E&S issues are part of all monitoring activities.

KFW will participate directly in monitoring visits and progress tracking visits, including environmental and social experts of KFW. Monitoring reports from the grantees will be shared with KFW for comments and no objection, including environmental and social documentation.

4.5.1 Monitoring by the grantees

The grantee is responsible for the day-to-day monitoring of the implementation of the E&S requirements and stakeholder engagement in the projects. It is the grantee's responsibility to agree with its contractors on how the monitoring will be conducted. A template for an E&S Monitoring Checklist is given in Annex H.

In any case, the following requirements will be mandatory for the grantee:

- Stakeholder engagement needs to be documented by the grantee in the form of minutes of meetings, as far as possible backed up by attendance lists (see also Annex C for stakeholder engagement reporting).
- Contractors will immediately report on arising emergency situations to the grantee. The grantee is required to document those issues and report them to the Blue Action Fund as soon as possible.
- Emergency situations can include, but are not limited to:
 - Fatality or severe accident at construction site or in community directly related to construction activities (such as traffic accident);
 - Unforeseen externally triggered situation that needs or is likely to need an interruption or postponement of works (security concerns in the area, natural disaster, social/community unrest);
 - Unacceptable working conditions such as child labour or forced labour issues;
 - Non-compliance with national requirements, such as loss of the operation permit or any other necessary authorisation provided by local authorities or legal claims (or threat of) formulated against the project;
 - Unforeseen project complication such as land / livelihood / access issues (unexpected need of physical or economic displacement) or significant environmental impacts;
 - Any grievances issued by workers, project affected people or other stakeholders that need a rapid redress, or
 - Any other issue that is likely to severely put at stake the project success or the reputation of Blue Action Fund.

A grantee failing to provide best efforts to fulfil this reporting requirement may be considered as breaching its contract, which may eventually lead to cancelation of the funding or exclusion for future funding.

- The grantee has to provide information on the progress of the ESMP implementation as part of the half-yearly and annual grant reporting documents to the Blue Action Fund.
- The grantee will generally provide best efforts to be kept informed on the situation, possibly by confirming the information from the contractors via engagement with community and/or community representatives or by using the information provided on the (social) media.
- Other issues to be reported in progress and completion reports are those that do not need immediate action by the Blue Action Fund. These may include, but are not limited to:



- Minor accidents and response implemented to address the risk;
- Minor deviations in the ESMP, including non-relevance of ESMP requirements;
- Project deviations that do not trigger E&S risk or social acceptance of the project.

5 ANNEXES

5.1 [Annex A: Overview Applicable International Environmental and Social Standards](#)

5.2 Annex B: Environmental & Social Questionnaire & Screening Report

5.2.1 [Part I – E&S Questionnaire](#)

5.2.2 [Part II – E&S Screening Report](#)

5.3 [Annex C: Stakeholder Engagement Plan \(including Grievance Mechanism\)](#)

5.4 [Annex D: Social Impact Assessment Guidance Note](#)

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5.7 [Annex G: Environmental & Social Management Plan– Small Construction](#)

5.8 [Annex H: Health & Safety Plan – Minor Construction Activities](#)





Environmental & Social Management System (ESMS)

Annex A Overview Applicable International Environmental and Social Standards

May 2019



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1 INTRODUCTION

The following international Environmental and Social Standards and Guidelines underpin Blue Action Fund's commitment to mainstream social and environmental sustainability in its projects and to support sustainable development by enhancing positive opportunities and benefits as well as ensuring that adverse risks and impacts are avoided, minimized, mitigated and managed.

Therefore, all project activities financed and supported by Blue Action Fund on the one side need to be compliant with provisions of legal framework of the host countries of the projects and on the other side need to adhere to the international requirements and standards as well as take account of the information presented within the guidelines, as applicable, below.

2 IFC - PERFORMANCE STANDARDS (WORLD BANK GROUP)

IFC's Performance Standards (2012)¹ define projects promoters' responsibilities for managing their environmental and social risks.

Performance Standard	Scope
PS 1: Social and Environmental Impact Assessment	Requires the establishment of an environmental and social management system to help projects to anticipate environmental and social risks posed by their activities and avoid, minimize, and compensate for such impacts as necessary. A good management system provides for consultation with stakeholders and a means for complaints from workers and local communities to be addressed.
PS 2: Labour and Working Conditions	Requires that companies treat their workers fairly, provide safe and healthy working conditions, avoid the use of child or forced labour, and identify risks in their primary supply chain. IFC Performance Standard 2 also requires consideration of International Labour Office Conventions, particularly the eight "fundamental" Conventions: <ul style="list-style-type: none"> • ILO Convention 87 on Freedom of Association and Protection of the Right to Organize • ILO Convention 98 on the Right to Organize and Collective Bargaining • ILO Convention 29 on Forced Labour • ILO Convention 105 on the Abolition of Forced Labour • ILO Convention 138 on Minimum Age (of Employment) • ILO Convention 182 on the Worst Forms of Child Labour • ILO Convention 100 on Equal Remuneration • ILO Convention 111 on Discrimination (Employment and Occupation)
PS 3: Pollution Efficiency and Pollution Prevention	Requires consideration of practices and technologies that promote energy efficiency, use resources—including energy and water—sustainably, and reduce greenhouse gas emissions.

¹ [IFC Performance Standards](#)



PS 4: Community Safety, Health and Security	Requires adoption of responsible practices to reduce exposure of local communities to risks and adverse impacts related to worksite accidents, hazardous materials, spread of diseases, or interactions with private security personnel including through emergency preparedness and response, security force management.
PS 5: Land Acquisition and Involuntary Resettlement	Requires projects to avoid involuntary resettlement and to minimize its impact on those displaced through mitigation measures such as fair compensation and improvements to and living conditions. Active community engagement throughout the process is essential.
PS 6: Biodiversity Conservation and Sustainable Natural Resource Management	Requires projects to consider biodiversity protection and conservation, to maintain ecosystem services, and to manage adequately living natural resources, which is especially relevant in developing countries where natural resource-based livelihoods are often prevalent.
PS 7: Indigenous People ²	Defines Indigenous People and requires activities to minimize negative impacts, to foster respect for human rights, dignity and culture of indigenous populations, and to promote development benefits in culturally appropriate ways. Informed consultation and participation with IPs throughout the project process is a core requirement. In case IFC PS 7 (Indigenous Peoples) would be triggered, the principle of free, prior and informed consent (FPIC) has to be applied.
PS 8: Cultural Heritage	Requires to protect cultural heritage from the adverse impacts of project activities and support its preservation and to promote the equitable sharing of benefits from the use of cultural heritage. Cultural heritage encompasses properties and sites of archaeological, historical, cultural, artistic, and religious significance.

3 KfW SUSTAINABILITY GUIDELINE

The KfW Sustainability Guideline - Assessment of Environmental, Social, and Climate Performance: Principles and Process (2016)³ requires that all applicable national environmental, occupational health and safety and social laws and regulations as well as International Law including conventions and treaties adopted by the respective host country and applicable to the project are adhered to.

The KfW Sustainability Guideline itself does not comprise separate standards for E&S assessment, mitigation and monitoring. It rather refers to World Bank Group (WB Group) Environmental and Social Safeguards (ESS) (for government-implemented projects) and International Finance Corporation (IFC) Environmental and Social Performance Standards (PS) (for private-sector projects), as well as the various WBG/IFC Environmental, Health and Safety

² In case IFC PS 7 (Indigenous Peoples) would be triggered, the principle of free, prior and informed consent (FPIC) has to be applied: FPIC refers to the process whereby an affected community of indigenous peoples arrives at a decision in accordance with their legal provisions, cultural traditions and practices. The FPIC process should produce a clear endorsement or rejection of the proposed project and a statement of accompanying mitigating measures and/or benefit-sharing agreements. FPIC is expected to be established through good faith negotiation between the NGO and the participating indigenous communities and to be fully documented as a mutually accepted process between the parties, carrying evidence of agreement between them as the outcome of the negotiations and clearly outlining benefit- and risk-sharing provisions

³ [KfW Sustainability Guideline](#)



(EHS) Guidelines as applicable to a particular project type. Therefore, the compliance of the ESMS with International Environmental and Social Safeguards is required.

4 THE WORLD BANK GROUP - EHS GUIDELINES

The Environmental, Health and Safety (EHS) Guidelines⁴ are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). The EHS Guidelines contain the acceptable performance levels and measures that are generally considered to be achievable in new facilities at reasonable costs by existing technology. When host country regulations differ from the levels and measures presented in the EHS Guidelines, projects will be required to achieve whichever is more stringent.

Relevant EHS Guidelines for Blue Action Fund activities could comprise:

- General EHS Guidelines (e.g. for any construction activities),
- Aquaculture,
- Tourism and Hospitality Development.

5 BMZ - GUIDELINES ON HUMAN RIGHTS STANDARDS

The German Federal Ministry for Economic Cooperation and Development's (BMZ) Guidelines on Incorporating Human Rights Standards and Principles, Including Gender, in Programme Proposals for Bilateral German Technical and Financial Cooperation⁵ are designed to provide assistance with the mandatory appraisal of human rights risks and impacts. They also translate the 'Guidelines and annotated outline for Programme Proposals for Joint Development Cooperation Programmes' into more specific terms with regard to human rights. The human rights due diligence requirements as laid out in these guidelines are also the basis for reporting, evaluation and accountability mechanisms.

The guidelines illustrate selected human rights risk areas and propose ways of enhancing the human rights orientation of development interventions.

6 UN - BASIC PRINCIPLES AND GUIDELINES ON DEVELOPMENT-BASED EVICTIONS AND DISPLACEMENT

Briefly summarized, the UN Basic Principles and Guidelines on Development-based Evictions and Displacement⁶ requires the following:

- Fair and Just Compensation: For any economically assessable damage, as appropriate and proportional to the gravity of the violation and the circumstances of each case. They further state that cash compensation should under no circumstances replace real compensation in the form of land and common property resources.
- Restitution and Return: when circumstances allow the State should prioritise restitution and return for all persons, subjected to forced evictions affected persons shall not, however, be forced against their will to return to their homes, lands or places of origin.

⁴ [World Bank Group EHS Guidelines](#)

⁵ [BMZ Guidelines on Human Rights Standards](#)

⁶ [UN Principles & Guidelines on Development based evictions and displacement](#)



When return is possible, the competent authorities should establish conditions and provide support for people to return.

- Resettlement and Rehabilitation: must occur in a just and equitable manner and in full accordance with international human rights law.

In addition to national legislation and international safeguard requirements the UN Basic Principles and Guidelines on Development-based Evictions and Displacement (namely §§ 42, 49, 52, 54 and 60) have to be complied with for resettlement aspects, which are not already covered by the Blue Action Fund Exclusion List.

7 IFC & EBRD - WORKERS' ACCOMMODATION

For workers' accommodation, Blue Action Fund's projects should adhere to international standards for worker housing such as "Workers' Accommodation: Processes and Standards: A Guidance Note by IFC and the EBRD"⁷.

The guidance note addresses the processes and standards that should be applied to the provision of workers' accommodation in relation to projects originally funded by the EBRD or IFC. In this regard, all projects funded and supported by Blue Action Fund should likewise adhere to this guidance note.

There is a range of different types of workers' accommodation that may be required by various projects and at different stages within projects, including temporary exploration camps, construction camps and permanent dormitories. Specific issues arise in relation to each of these. This note reviews various international, national, private sector and public sector standards and guidance that are more generally applicable.

At the initial stage of any project, there is a need to assess whether accommodation for workers is required, and if so, whether this can be provided within existing local communities or whether new facilities should be constructed. The likely impact on local communities and the housing market of either option should be assessed.

There are no universally applicable international regulations relating to workers' accommodation standards in general. However, there are some international standards/guidance on food safety, water sanitation and waste management that should be applied, and national or local building regulations that must be complied with.

8 FAO - VOLUNTARY GUIDELINES ON THE RESPONSIBLE GOVERNANCE OF TENURE OF LAND, FISHERIES AND FORESTS (VGGT)

The Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests (VGGT)⁸

- promote secure tenure rights and equitable access to land, fisheries and forests as a means of eradicating hunger and poverty, supporting sustainable development and enhancing the environment;
- promote responsible governance of tenure of land, fisheries and forests, with respect to all forms of tenure: public, private, communal, indigenous, customary, and informal;

⁷ [Accommodation Guidance note](#)

⁸ [VGGT](#)



- require equitable access and secure tenure rights with respect to all forms of tenure (public, private, communal, indigenous, customary and informal); and
- require a responsible governance as a crucial element in addressing many tenure-related problems and positively affecting social stability and a sustainable use of the environment.

9 8. FAO - CODE OF CONDUCT FOR RESPONSIBLE FISHERIES (CCRF)

The Code of Conduct for Responsible Fisheries⁹

- sets out principles and international standards of behaviour for responsible practices with a view to ensuring the effective conservation, management and development of living aquatic resources, with due respect for the ecosystem and biodiversity;
- recognizes the nutritional, economic, social, environmental and cultural importance of fisheries and the interests of all stakeholders of the fishing and aquaculture industries; and
- takes into account the biological characteristics of the resources and their environment and the interests of consumers and other users.

10 FAO - VOLUNTARY GUIDELINES FOR SECURING SUSTAINABLE SMALL-SCALE FISHERIES (VGSSF)

The Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries

- provide complementary guidance with respect to small-scale fisheries in support of the overall principles and provisions of the CCRF;
- support the visibility, recognition and enhancement of the already important role of small-scale fisheries and contribute to global and national efforts towards the eradication of hunger and poverty; and
- support responsible fisheries and sustainable social and economic development for the benefit of current and future generations, with an emphasis on small-scale fishers and fish workers and related activities and including vulnerable and marginalized people, promoting a human rights-based approach.

⁹ [CCRF](#)





Environmental & Social Management System (ESMS)

Annex B1 Environmental and Social Questionnaire

September 2019



ANNEX B – E&S Questionnaire & Screening Report

PART I – E&S Questionnaire

The E&S Questionnaire is to be filled out by the **project proponent** (unless where otherwise specified) and then returned to the Blue Action Fund for review. Please provide information as detailed as possible. There might be questions that are not applicable to the specific project and others where further information will be necessary to complete. Please use as much space as necessary and provide details and remarks on missing information as possible.

Project Data

Project title:			
Project proponent:			
Contract value (EUR):			
Country:			
Start date:		Duration:	

E&S Questionnaire

	Name and function of individual representing project proponent	Date
ESMS Questionnaire completed by:		

E&S Documents

	Title	Date
Environmental & social documents submitted so far:		

Project Type & Summary

To be completed by project proponent	
Project type	
<p><i>Tick all that apply</i></p> <p><input type="checkbox"/> Designation of new Marine Protected Area (MPA)</p> <p><input type="checkbox"/> Extension of existing MPA</p> <p><input type="checkbox"/> Project in an existing MPA</p> <p><input type="checkbox"/> Other marine conservation measures (not connected to a MPA)</p> <p><input type="checkbox"/> Activities on land within a Protected Area</p> <p><input type="checkbox"/> Activities on land outside a Protected Area</p> <p><input type="checkbox"/> Community engagement</p> <p><input type="checkbox"/> New aquaculture</p> <p><input type="checkbox"/> Expansion or adaptation of existing aquaculture</p> <p><input type="checkbox"/> Small-scale construction activities, please specify:</p> <p><input type="checkbox"/> Other, please specify:</p>	

A. Process of stakeholder engagement during project conceptualization

Note: All Blue Action Fund projects require the preparation of a Stakeholder Engagement Plan (SEP). It is recommended to prepare the SEP as early as possible and document all stakeholder engagement activities in the SEP. Throughout the duration of the project, the SEP needs to be updated regularly to account for the ongoing stakeholder engagement activities. The information given below can be used to prepare the SEP, or in case a SEP already exists, the SEP can be referenced and the results can be summarized below.

1. **Stakeholder Analysis:** Has a project stakeholder analysis been carried out and documented (e.g. as part of a SEP) – identifying not only stakeholders' interests in the project and their influence but also whether they might be affected by the project? Does the stakeholder analysis differentiate between women and men, where relevant and feasible?

To be completed by project proponent

Blue Action Fund ESMS Reviewer

2. **Stakeholder Consultation:** Please summarise what information about the project – objectives, activities, sites and potential risks – has been shared with stakeholders. Please state how these consultations were conducted (e.g. in a culturally appropriate way)? Provide details about the groups involved. How were women involved? Were women consulted separately? Did the consultations involve stakeholders that might be negatively affected by the project? How have the results of the consultations been documented? If applicable, how were the results used to inform the project design?

To be completed by project proponent

Blue Action Fund ESMS Reviewer

B. Potential impacts related to ESMS standards			
B1: Assessment and Management of Environmental and Social Risks and Impacts			
	Project proponent	Blue Action Fund ESMS Reviewer	
	Yes, no, n/a, TBD	Answer question, provide further detail where relevant	Comments, additional considerations
1. Please indicate who within the project proponent/ for this project will be responsible for E&S implementation. Please provide name, qualification and experience.			
2. Is there a risk that the project triggers consequential development activities, e.g. tourism, which could lead to adverse environmental impacts, cumulative impacts due to interaction with other projects (current or planned) or to transboundary impacts?			
3. Are there any requirements for environmental and social impact assessments in the host country (including provisions for disclosure and consultation) the project needs to adhere to?			
4. Is there a risk that the project might conflict with existing environmental regulations?			
5. Is there a risk that the project might conflict with existing legal social frameworks including traditional frameworks and norms?			
6. Are any of the <i>World Bank Environmental, Health & Safety Guidelines</i> applicable to this project? If yes, please state which one(s) and why and to what extent.			
7. Are the <i>BMZ Guidelines on Incorporating Human Rights Standards and Principles, Including Gender, in Programme Proposals for Bilateral German Technical and Financial Cooperation</i> applicable to this project? If yes, please state why and to what extent.			
8. Are <i>UN Basic Principles and Guidelines on Development-based Evictions and Displacement</i> applicable to this project? If yes, please state why.			
9. Are the <i>Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security</i> applicable to this project? If yes, please state why and to what extent.			
10. Is the <i>FAO Code of Conduct for Responsible Fisheries</i> applicable to this project? If yes, please state why.			
11. Are the <i>FAO Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries</i> applicable to this project? If yes, please state why and to what extent.			
12. Please indicate where you see the main risks regarding E&S assessment and management. What is the likelihood of negative impacts? How can they avoided and/or mitigated?			
13. In case you did an Environmental and Social Risk Category, provide information which risk category was assigned to the Project and rationale for categorization			
14. Please describe the grievance mechanism on the project level and explain, how accessibility, transparency and cultural appropriateness will be ensured			

Conclusion of Blue Action Fund ESMS Reviewer on the Assessment and Management of Environmental and Social Risks and Impacts		
IFC PS 1 triggered? Yes / No / TBD		
Are assessments required to better understand the impacts and identify mitigation measures? What specific topics are to be assessed?		
Have measures for avoiding impacts already been considered? Do they seem sufficient?		

B2: Labor and Working Conditions			
	Project proponent		Blue Action Fund ESMS Reviewer
	Yes, no, n/a, TBD	Answer question, provide further detail where relevant	Comments, additional considerations
1. Might the project be directly or indirectly involved in forced labour and/or child labour?			
2. Have your projects or organisation had any serious H&S incidents (fatality, serious injuries) or labour issues in the last 5 years? Please provide details if so.			
3. Is it planned that communities will provide labour as a contribution? Please provide estimates of number of workers and person-days expected?			
4. Does your organisation have special HR and H&S policies in place?			
5. Please indicate where you see the main risks regarding labor and working conditions. What is the likelihood of negative impacts? How can they avoided and/or mitigated?			

Conclusion of Blue Action Fund ESMS Reviewer on Labor and Working Conditions		
IFC PS 2 triggered? Yes / No / TBD		
Are assessments required to better understand the impacts and identify mitigation measures? What specific topics are to be assessed?		
Have measures for avoiding impacts already been considered? Do they seem sufficient?		

B3: Resource Efficiency and Pollution Prevention			
	Project proponent		Blue Action Fund ESMS Reviewer
	Yes, no, n/a, TBD	Answer question, provide further detail where relevant	Comments, additional considerations
1. Will the project lead to increased waste production, in particular hazardous waste?			
2. Do any of the activities involve use, storage, handling or			

transportation of hazardous goods (e.g. fuel for boat use)? If yes, how is this stored?			
3. Is the project likely to cause: - pollution or degradation of sediment or soil - changes to sediment transport (e.g. coastal erosion) - soil/ sediment erosion or siltation of waterbodies?			
4. Might the project cause pollution to air or create other nuisances such as dust, land based traffic, increased marine traffic, noise or underwater noise or odour?			
5. Will the project lead to significant increases of greenhouse gas emissions or to the reduction of carbon sinks (e.g. through changes in vegetation cover and loss of below and above ground carbon stocks).			
6. Please indicate where you see the main risks regarding resource efficiency and pollution. What is the likelihood of negative impacts? How can they avoided and/or mitigated?			

Conclusion of Blue Action Fund ESMS Reviewer on Resource Efficiency and Pollution Prevention

Standard IFC PS 3? Yes / No / TBD		
Are assessments required to better understand the impacts and identify mitigation measures? What specific topics are to be assessed?		
Have measures for avoiding impacts already been considered? Do they seem sufficient?		

B4: Community Health, Safety & Security

	Project proponent	Blue Action Fund ESMS Reviewer
	Yes, no, n/a, TBD	Answer question, provide further detail where relevant
		Comments, additional considerations
1. Is there a risk that the project affects community health and safety (incl. construction activities, risks of spreading diseases, human-wildlife conflicts, conflicts with wildlife officers / enforcement of protected area regulations)?		
2. Is there a risk that changes in water resource management or enhanced water infrastructure may attract disease vectors and other environmental health issues (e.g. through poor water quality) and as such lead to an outbreak of water-related disease?		
3. Does the project support any ranger/control/law enforcement personnel or activities? If yes, please provide details about the support (e.g. trainings, equipment etc.).		
4. Please indicate where you see the main risks regarding community health, safety and security. What is the likelihood of negative impacts? How can they avoided and/or mitigated?		

Conclusion of Blue Action Fund ESMS Reviewer on Community Health, Safety & Security		
IFC PS 4 triggered? Yes / No / TBD		
Are assessments required to better understand the impacts and identify mitigation measures? What specific topics are to be assessed?		
Have measures for avoiding impacts already been considered? Do they seem sufficient?		

B5: Land Acquisition and Involuntary Displacement			
	Project proponent		Blue Action Fund ESMS Reviewer
	Yes, no, n/a, TBD	Answer question, provide further detail where relevant	Comments, additional considerations
1. Will/ might the project require the acquisition of land for project purposes (e.g. infrastructure development)? If yes, describe the current legal status of the land (private/ public, occupied/unoccupied); will this impact people's livelihood or access to resources?			
2. Will the project involve physically displacing peoples or communities? if yes, answer a-c below		Shaded cells do not need to be filled out	
a. Describe the project activities that require physical displacement.			
b. Have alternative project design options for avoiding physical displacement been rigorously considered?			
c. Will this physical displacement be through - "willing-buyer-willing-seller", - an involuntary process (government-led or other), or - not yet determined? If "willing-buyer-willing-seller" approach, please attach supporting documentation to support this.			
3. Does the project include activities that might restrict peoples' access to land or natural resources ¹ or even economic displacement? Please consider the following activities: establishing new protected areas (PA) or extending the area of an existing PA, improving enforcement of PA regulations (e.g. training guards, providing monitoring and/or enforcement equipment , providing training/tools for improving management effectiveness), constructing physical barriers that prevent people accessing certain places; exclusion zones; changing how specific natural resources are managed (to a management system that is more restrictive); if yes, answer a-h below			
a. Describe project activities that involve restrictions			

¹ A process framework needs to be prepared when Blue Action Fund projects may cause involuntary restrictions in access to natural resources in legally designated parks and protected areas. This triggers the requirement to achieve the objectives of World Bank Environmental and Social Standard 5 (Land Acquisition, Restriction on Land Use and Involuntary Resettlement).

and the respective resources to be restricted.			
b. Is the access restriction voluntary (decided by the community) or involuntary (e.g. (tighter) enforcement of PA regulations)?			
c. Has the legal framework regulating land tenure and access to natural resource been analysed, broken down by different groups including women and ethnic/indigenous groups? Are customary rights for land and natural resources recognized? Are there any groups at the project site whose rights are not legally recognized?			
d. Have the implications of access restrictions on people's livelihoods been analysed through a formal study e.g. process framework (please provide a copy)? Summarise who might be affected and describe impacts. Distinguish social groups (incl. vulnerable groups, indigenous peoples) and men and women.			
e. Have strategies been considered to avoid or reduce restrictions by making changes to project design?			
f. Please describe to what extent access to natural resources will be restricted.			
g. Please describe measures which will be implemented to minimize or compensate for impacts from loss/ restrictions of access.			
h. Are eligibility criteria established that define who is entitled to benefits or compensation? Please provide details on these to demonstrate that they transparent and fair (e.g. in proportion to their losses and to their needs if they are poor and vulnerable).			
i. Provide explain how these have been chosen to be culturally appropriate and gender inclusive and to match the geographical scale of the measures to the scale of the restrictions (e.g. will measures be accessible to all groups affected by the restrictions).			
j. If any communities defined as indigenous will be affected, has a process been implemented or started to obtain free,prior and informed consent (FPIC) from those to be negatively affected by restrictions? Please describe the process (who has been consulted, when and how or plans to complete).			
4. Please indicate where you see the main risks regarding physical or economic displacement, including access restriction. What is the likelihood of negative impacts? How can they avoided and/or mitigated?			

Conclusion of Blue Action Fund ESMS Reviewer on the Standard on Involuntary Resettlement and Access Restrictions

IFC PS 5 triggered? (Yes / No / TBD)		
World Bank ESS 5 triggered? (Yes / No / TBD)		

Are assessments required to better understand the impacts and identify mitigation measures? What specific topics are to be assessed?	
Have measures for avoiding impacts already been considered? Do they seem sufficient?	

B6: Biodiversity Conservation and Sustainable Management of Living Natural Resources			
	Project proponent		Blue Action Fund ESMS Reviewer
	Yes, no, n/a, TBD	Answer question, provide further detail where relevant	Comments, additional considerations
1. Blue Action Fund is only funding conservation projects in areas of high biodiversity. If the project is not located in an area of high biodiversity value, please explain the rationale for this.			
2. For projects aiming to establish or expand a protected area (PA) or to change its management regime, please describe the potential negative impacts on natural resources in areas outside the PA.			
3. For projects establishing any infrastructure in a PA or an area of high biodiversity value (e.g., watch tower, tourism facilities, access roads, small scale water infrastructure), please describe the potential negative impacts on biodiversity (e.g. on threatened species) during its construction and use.			
4. For projects promoting ecotourism, please describe the potential negative impacts on biodiversity (e.g., due to waste disposal, disturbance, slope erosion etc.).			
5. For projects involving civil works or infrastructure development outside of PA or other areas of high biodiversity value, please describe any potential risk of significant impact on biodiversity.			
6. Will the project include introduction or translocation of species (e.g. for erosion control, dune stabilisation or reforestation) or include production of living natural resources? If yes, provide details and answer questions a-b			
a. Does this project involve non-native species or risk introducing non-native species by accident?			
b. If a. is yes, is there a risk that these species might develop invasive behaviour?			
7. Please describe any risks that the project might create other pathways for spreading invasive species (e.g. through creation of corridors, import of commodities, tourism or movement of boats)?			
8. For projects involving diversion or containment of surface or ground water (e.g., through dams, reservoirs, canals, levees, river basin developments, groundwater extraction) or through other activities, please describe the negative impacts to water flow regimes?			
9. Is there a risk that the project negatively affects water dynamics, river connectivity or the hydrological cycle in			

ways other than direct changes of water flows (e.g., by affecting water infiltration, aquifer recharge or sedimentation)? Also consider reforestation projects as originators of such impacts.			
10. Is there a risk that the project affects water quality of surface or groundwater (e.g., contamination, increase of salinity) through irrigation/ agricultural run-off, water extraction practices, influence of livestock or other activities?			
11. If the project promotes the use of living natural resources (such as non-timber forest products), please describe how the project ensures that harvest rates are controlled/ monitored?			
12. Does the project intend to use pesticides, fungicides or herbicides (biocides)? If yes, provide details and answer questions a-b			
a. Have alternatives to the use of biocides been rigorously considered or tested?			
b. Has a pest management plan been established?			
13. In case the project intends to use biological pest management techniques, please describe the potential risks of adversely affecting biodiversity.			
14. Please describe any risks that project activities may have on fragmentation of the landscape (terrestrial and marine).			
15. Please describe any risks that the adverse knock-on effects of the project may on biodiversity in a wider area of influence (landscape/ watershed, regional or global levels) including transboundary impacts.			
16. Please describe any risks associated with consequential developments triggered by the project will have adverse impacts on biodiversity. Is there a risk of adverse cumulative impacts generated together with other known or planned projects in the area?			
17. Please indicate where you see the main risks regarding biodiversity and natural resource management. What is the likelihood of negative impacts? How can they avoided and/or mitigated?			

Conclusion of *Blue Action Fund ESMS Reviewer* on the Standard on Biodiversity Conservation and Sustainable Use of Natural Resources

IFC PS 6 triggered? Yes / No / TBD

Are assessments required to better understand the impacts and identify mitigation measures? What specific topics are to be assessed?

Have measures for avoiding impacts already been considered? Do they seem sufficient?

B7: Indigenous Peoples

	Project proponent		Blue Action Fund ESMS Reviewer
	Yes, no, n/a, TBD	Answer question, provide further detail where relevant	Comments, additional considerations
1. Is the project site in an area inhabited by or important to indigenous peoples, tribal peoples or other traditional peoples, or is there a risk that the project could affect the rights and livelihood of indigenous peoples? If yes, answer questions a-h			
a. Name the groups; distinguish, if applicable, the geographical areas of their presence (including the areas of resource use) and how these relate to the project's area of influence.			
b. How does the host country's government refer to these groups (e.g., indigenous peoples, minorities, tribes etc.)?			
c. Is there a risk that the project affects their livelihood through access restrictions? If yes, please specify the indigenous groups affected.			
d. Is there a risk that the project affects their livelihood in some other means, e.g. by affecting their self-determination, cultural identity, values and practices, social cohesion, or by providing inequitable benefits?			
e. Does the project intend to promote the use of indigenous peoples' traditional knowledge?			
f. Are indigenous groups living in voluntary isolation? Is there a risk that these groups might be affected by project activities?			
g. Explain whether and how legitimate representatives of indigenous groups have been consulted to discuss the project and better understand potential impacts upon them.			
h. Explain whether a process has been implemented or started to achieve free, prior and informed consent (FPIC) of indigenous peoples to activities relevant to them.			
i. Explain whether opportunities are considered to provide benefits for indigenous peoples. If yes, how is it ensured that this is done in a culturally appropriate and gender inclusive way?			
j. Please indicate where you see the main risks regarding indigenous people. What is the likelihood of negative impacts? How can they avoided and/or mitigated?			

Conclusion of Blue Action Fund ESMS Reviewer on the Standard on Indigenous Peoples

IFC PS 7 triggered? Yes / No / TBD	
Are assessments required to better understand the impacts and identify mitigation measures? What specific topics are to be assessed?	

Have measures for avoiding impacts already been considered? Do they seem sufficient?	
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B8: Cultural Heritage			
	Project proponent		Blue Action Fund ESMS Reviewer
	Yes, no, n/a, TBD	Answer question, provide further detail where relevant	Comments, additional considerations
1. Is the project located in or near a site officially designated or proposed as a cultural heritage site (e.g., UNESCO World Cultural or Mixed Heritage Sites, or Cultural Landscapes) or a nationally designated site for cultural heritage protection? if yes, answer a-c below			
2. Does the area affected by the project include important cultural resources such as burial sites, buildings or monuments of archaeological, historical, artistic, religious, spiritual or symbolic value? if yes, answer a-c below			
3. Does the project area site include any natural features or resources that are of cultural, spiritual, or symbolic significance (such as sacred natural sites, ceremonial areas, or sacred species)? if yes, answer a-c below			
a. Will the project involve development of infrastructure (e.g. roads, jetty) or construction of buildings (e.g. ranger office, visitor centre, tourism facilities)?			
b. Will the project involve excavation or movement of earth, flooding or physical environmental changes (e.g., as part of ecosystem restoration)?			
c. Is there a risk that physical interventions described in items a. and b. might affect known or unknown (buried) cultural resources?			
4. Will the project restrict local users' access to cultural resources or natural features/sites with cultural, spiritual or symbolic significance?			
5. Please comment on the project's potential negative impact on cultural values, norms or practices of local communities.			
6. Will the project promote the use of (or development of economic benefits) from cultural resources or natural features/sites with cultural significance?			
7. Please indicate where you see the main risks regarding cultural heritage. What is the likelihood of negative impacts? How can they avoided and/or mitigated?			
Conclusion of Blue Action Fund ESMS Reviewer on the Standard on Cultural Heritage			
IFC PS 8 triggered? Yes / No / TBD			
Are assessments required to better understand the impacts and identify mitigation measures? What specific topics are to be assessed?			

Have measures for avoiding impacts already been considered? Do they seem sufficient?	
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C. Climate change risks (Risks caused by a failure to adequately take the effects of climate change on people and ecosystem into consideration)

	Project proponent		Blue Action Fund ESMS Reviewer
	Yes, no, n/a, TBD	Answer question, provide further detail where relevant	Comments, additional considerations
1. Is the project area prone to specific climate hazards (e.g., floods, droughts, wildfires, landslides, cyclones, storm surges, etc.)?			
2. Is there a risk that climate variability and changes might affect the effectiveness of project activities or the sustainability of intended changes?			
3. Could project activities potentially increase the vulnerability of local communities to current or future climate variability and changes?			
4. Could project activities potentially increase the vulnerability of the local ecosystem to current or future climate variability and changes?			
5. Will the project seek opportunities to enhance the adaptive capacity of communities and ecosystem to climate change?			
6. Please indicate where you see the main risks regarding climate change. What is the likelihood of negative impacts? How can they avoided and/or mitigated?			

Conclusion of Blue Action Fund ESMS Reviewer on the Climate Change Risks

Are assessments required to better understand the impacts and identify mitigation measures? What specific topics are to be assessed	
Have measures for avoiding impacts already been considered? Do they seem sufficient?	

D. Other social or environmental impacts

	Project proponent		Blue Action Fund ESMS Reviewer
	Yes, no, n/a, TBD	Answer question, provide further detail where relevant	Comments, additional considerations
1. Is there a risk that the project negatively affects human rights (e.g., right to self-determination, to education, to health, or cultural rights) – other than issues related to indigenous peoples which are dealt with in the respective standard? Differentiate between women and men, where applicable.			
2. Will the project influence land tenure arrangements or community-based property rights to land or resources and is there a risk that this might adversely affect			

peoples' rights and livelihoods? Consider in particular impacts on transhumance (seasonal movement of livestock), vulnerable groups, different gender etc.?			
3. Will the project have equal benefit for women and men? How will the project address historical gender imbalances?			
4. Explain whether the project use opportunities to secure and, when appropriate, enhance the economic, social and environmental benefits to women?			
5. Explain whether the project provide, when appropriate and consistent with national policy, for measures that strengthen women's rights and access to land and resources?			
6. Provide details of steps take to ensure that the project does not negatively affect vulnerable groups ² in terms of material or non-material livelihood conditions or contribute to their discrimination or marginalisation (only issues not captured in any of the sections above)? Please describe any residual risks?			
7. Provide details of steps taken to prevent the project from stirring or exacerbate conflicts among communities, groups or individuals (e.g. by increasing resource competition when promoting economic opportunities or when strengthen rights of selected groups)? Also consider dynamics of recent or expected migration and issues / needs of displaced people. Please describe any residual risks?			
8. Is the project likely to induce immigration or significant increases in population density which might trigger environmental or social problems (with special consideration to women)?			
9. Is there a risk that the project negatively affects the livelihoods of local communities in indirect ways or through cumulative (due to interaction with other projects or activities, current or planned) or transboundary impacts?			
10. Please indicate where you see the main risks regarding other E&S impacts. What is the likelihood of negative impacts? How can they avoided and/or mitigated?			

Conclusion of Blue Action Fund ESMS Reviewer on other Social or Environmental Impacts

Are assessments required to better understand the impacts and identify mitigation measures? What specific topics are to be assessed?

Have measures for avoiding impacts already been considered? Do they seem sufficient?

² Depending on the context vulnerable groups could be landless, elderly, disabled or displaced people, children, ethnic minorities, people living in poverty, marginalised or discriminated individuals or groups.



ANNEX B - PART II

E&S Screening Report

The E&S Screening Report is to be filled out by the Blue Action Fund Reviewer based on the filled out E&S Questionnaire (Annex B - Part I) from the project proponent.

Project Data

Project title:	
Project proponent:	

E&S Screening

To be completed by Blue Action Fund ESMS reviewer(s)

	Name	Function	Date
Blue Action Fund ESMS Reviewer:			

ESMS Screening Report		
Risk category:	<input type="checkbox"/> Low risk (Category C Project) <input type="checkbox"/> Moderate risk (Category B Project) <input type="checkbox"/> High risk (Category A Project) – <i>only funded by Blue Action Fund after approval from KfW KCUS</i>	
Is the project type listed on the Blue Action Fund Exclusion List?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Does the project include any construction activities?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Rationale: Summarize findings from the questionnaire and explain the rationale of risk categorization <i>See Section B of the questionnaire for details.</i>	Key environmental risks: Key labour and H&S risks: Key social risks (including resettlement and access restriction): Key climate risks:	
E&S Standards (IFC PS)	Trigger	Required tools or plans
IFC PS1: Social and Environmental Impact Assessment	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> TBD	<input type="checkbox"/> Stakeholder Engagement Plan (SEP) <input type="checkbox"/> Environmental and Social Assessment (ESA) <input type="checkbox"/> Social Impact Assessment (SIA) <input type="checkbox"/> Environmental and Social Management Plan (ESMP) (Small Construction) <input type="checkbox"/> Health & Safety Plan (Minor Construction Activities) <input type="checkbox"/> Other:

IFC PS2: Labor and Working Conditions	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> TBD	<input type="checkbox"/> ESMP (Small Construction) <input type="checkbox"/> Health & Safety Plan (Minor Construction Activities) <input type="checkbox"/> Other:
IFC PS3: Resource Efficiency and Pollution Prevention	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> TBD	<input type="checkbox"/> ESMP (Small Construction) <input type="checkbox"/> Other:
IFC PS4: Community Health, Safety & Security	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> TBD	<input type="checkbox"/> ESMP (Small Construction) <input type="checkbox"/> Other:
IFC PS5: Land Acquisition and Involuntary Resettlement	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> TBD	<input type="checkbox"/> Process Framework <i>(in case of access restriction)</i> <input type="checkbox"/> Livelihood Restoration Plan <i>(in case of economic resettlement)</i> <input type="checkbox"/> Resettlement Action Plan <i>(in case of physical resettlement)</i>
IFC PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> TBD	<input type="checkbox"/> Environmental & Social Assessment (ESA) <input type="checkbox"/> Other:
IFC PS7: Indigenous Peoples	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> TBD	<input type="checkbox"/> SEP with Free, Prior, Informed Consent (FPIC) Process <input type="checkbox"/> Indigenous Peoples Plan as appropriate <input type="checkbox"/> Other:
IFC PS8: Cultural Heritage	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> TBD	<input type="checkbox"/> ESMP (Small Construction), includes Chance Find Procedure ¹ <input type="checkbox"/> Other:

¹ Actions to be taken (e.g. stop construction, inform authorities) if previously unknown cultural heritage, e.g. archaeological finds/sites, are encountered.



Environmental & Social Management System (ESMS)

Annex C Stakeholder Engagement Plan

September 2019



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Acronyms and Abbreviations

ESIA	Environmental & Social Impact Assessment
ESMP	Environmental Social Management Plan
ESMS	Environmental & Social Management System
FPIC	Free, Prior and Informed Consent
ICP	Informed Consultation and Participation
IEE	Initial Environmental Examination
IFC	International Finance Corporation
ILO	International Labour Organization
NGO	Non-Governmental Organization
PS	Performance Standard
SEP	Stakeholder Engagement Plan
UNDRIP	United Nations Declaration on the Rights of Indigenous Peoples



1 Purpose

This document serves as a template for a Stakeholder Engagement Plan (SEP). The purpose of the SEP is to document all stakeholder activities for the project. It is a public document that needs to be disclosed to the affected communities. The SEP is a “living document” and needs to be revised and updated to account for the ongoing stakeholder engagement activities and potential changes in the project.

The SEP has to be prepared by the E&S responsible person of the Implementing Partner / Grantee. The text passages in grey italics have to be adapted or filled out by the Implementing Partner. The template can and should be adapted to fit the specific project.

Stakeholder engagement refers to a process of sharing information and knowledge, seeking to understand and respond to the concerns of others, and building relationships based on collaboration. Stakeholder consultation and disclosure are key elements of engagement and essential for delivery of successful projects.

The overall aim of the SEP is to ensure that a timely, consistent, comprehensive, coordinated and culturally appropriate approach is taken to consultation and project disclosure. It is intended to demonstrate the commitment of the Implementation Partner to an international best practice approach to engagement in line with IFC's Performance Standards (PS) on Environmental and Social Sustainability.¹ In this context, good stakeholder relations are also a prerequisite for good risk management.

1.1 Brief Description of the Project

Insert brief project description, including project components, location, area/layout, ideally include map(s)

1.2 Social Context

Insert information about the project's social context, e.g.

- directly affected communities, villages, districts etc. or close to the project affected area,
- any ethnic communities and/or indigenous peoples,
- if available, include a summary of any social or household surveys, e.g. current land use, source of income, literacy rate etc.

2 NATIONAL AND INTERNATIONAL REQUIREMENTS

Blue Action Fund is committed to full compliance with national and international stakeholder engagement and disclosure requirements.

2.1 Project's Host Country Requirements

Describe the national and international requirements for the project regarding stakeholder engagement and disclosure, e.g. check and describe if an environmental study (e.g. EIA, ESIA,

¹ [IFC Performance Standards](#)



IEE) is required and what the requirements are regarding public meetings, disclosure (what, when, where)

2.2 International Requirements

Blue Action Fund requires all of its projects to be compliant with IFC's 2012 Performance Standards (PS) on Environmental and Social Sustainability, including PS1 (Stakeholder Engagement and Information Disclosure) and PS7 (Indigenous Peoples).

Blue Action Fund is committed to community engagement that ensures the free, prior, and informed consultation of affected communities. Stakeholder Engagement shall be conducted on the basis of timely, relevant, understandable and accessible information, provided in a culturally appropriate format. In summary Blue Action Fund requires:

- Identification of key stakeholders, including people or communities that could be affected by the Project, as well as other interested parties;
- Meaningful consultation with project-affected or other interested parties on environmental and social issues that could potentially affect them;
- Disclosure of appropriate information and appropriate notification about this disclosure at a time when stakeholder views can still influence the development of the project;
- Stakeholder consultation during the whole lifecycle of the project, and starting as early as possible;
- Operation of a procedure by which people can submit comments and complaints (Grievance Mechanism);
- Maintenance of a constructive relationship with stakeholders on an ongoing basis through meaningful engagement during project implementation; and
- Special provisions shall apply to consultations which involve Indigenous Peoples as well as individuals belonging to vulnerable groups, and
- In particular, Free, Prior and Informed Consent (FPIC) is applied when operations encounter, affect or threaten the customary rights and interests of Indigenous Peoples, and it refers to the process whereby the affected community of Indigenous Peoples arrives at a decision in accordance with their legal provisions, cultural traditions and practices. The UN Declaration on the Rights of Indigenous Peoples² will serve as guidance when implementing the FPIC process.

3 IDENTIFICATION OF STAKEHOLDERS

The objective of stakeholder identification is to establish which organizations and individuals may be directly or indirectly affected (positively and negatively), or have an interest in the Project. Stakeholder identification is an ongoing process, requiring regular review and updating as the Project proceeds.

An example for stakeholders groups is given in the table below. The list should be adapted to fit the specific project and updated and modified over the course of the project.

Group of Stakeholders	Stakeholders
1. Land owner and users	1.1 Individuals, legal entities, local

² [UN Declaration on the Rights of Indigenous Peoples.](#)



	administration holding land title documents 1.2 Tenants or occupiers without formal rights 1.3 Land users (grazing, farming or other activities);
2. Local population	2.1 Inhabitants of the project affected villages 2.2 Residents located near the Project location 2.3 Residents of settlements located near roads used for transporting materials during construction 2.4 Indigenous Groups
3. Administrative Bodies and Authorities	3.1. National authorities (concerned ministries) 3.2. Regional authorities (district level government authorities) 3.3. Local authorities
4. General public, Non-Governmental Organizations (NGOs) and independent experts	4.1. General public 4.2 Specialized environmental, social and research organizations, NGOs 4.3 Experts on a national and international level
5. Media	5.1. Print media 5.2 Radio, TV 5.3. Internet sources
6. Organizations involved in Project implementation	6.1 Construction and design companies involved in implementation of the Project 6.2 Contractors and contractor's staff
7. Specific vulnerable groups who may be impacted by the Project.	7.1 People with difficulty in engaging with the stakeholder consultation process 7.2 People with special vulnerability due to physical disability, social, political or economic standing, legal status, limited education, lack of employment or housing

Contact information of selected individuals for the identified stakeholder groups are provided in the Annex I to this SEP.

4 INFORMED CONSULTATION AND PARTICIPATION

For projects with potentially significant adverse impacts on affected communities, the process of Informed Consultation and Participation (ICP) needs to be applied. ICP involves an in-depth exchange of views and information, and an organized and iterative consultation, leading to the incorporating of the views of the affected communities into the decision-making process on matters that affect them directly, like mitigation measures, sharing of development benefits and opportunities, and implementation issues.

The consultation process should

- I. capture both men's and women's views, if necessary through separate forums or engagements, and



- II. reflect men's and women's different concerns and priorities about impacts, mitigation mechanisms, and benefits, where appropriate. The client will document the process, in particular the measures taken to avoid or minimize risks to and adverse impacts on the Affected Communities, and will inform those affected about how their concerns have been considered.

5 VULNERABLE GROUPS AND INDIGENOUS PEOPLES

5.1 Vulnerable Groups

Vulnerable groups are population groups that suffer from discrimination, unequal access to rights, unequal access to and control over resources or unequal access to development opportunities. As a result, they may be poorly integrated into the formal economy, may suffer from inadequate access to basic public goods and services, and may be excluded from political decision-making. As a result, they risk being disproportionately affected by project-related risks and adverse impacts. Such groups may include ethnic, religious, cultural, linguistic minorities, indigenous groups, female-headed households, children and youngsters, the elderly, persons with disabilities, and the poor.

In the case of vulnerable groups, the Grantee has to ensure that vulnerable individuals and groups are duly and timely consulted, making sure that their concerns are heard, taking into account individuals' and communities' specificities, and delivered in an appropriate form, manner and language. This may be done in the form of focus group discussions. In some cases, special efforts must be made to ensure that vulnerable members have access to consultation events or discussion forums.

Insert description on vulnerable groups affected by the project.

5.2 Indigenous Peoples

Insert description on Indigenous Peoples affected by the project, if applicable. Include information on if IPs are recognized in the host country or not. Clearly state if indigenous peoples are affected by the project or not and amend following text accordingly or delete, if not applicable.

For projects with adverse impacts to Indigenous Peoples, the Grantee is required to engage them in a process of Informed Consultation and Participation (ICP). In addition, it is expected that in most cases the process of Free, Prior and Informed Consent (FPIC) has to be applied. This is the case if Indigenous Peoples are physically displaced, including through economic displacement, or if the Project is associated with any of the below listed potentially adverse impacts identified below:

- Impacts on lands and natural resources subject to traditional ownership or under customary use;
- Relocation of Indigenous Peoples from lands and natural resources subject to traditional ownership or under customary use;
- Significant impacts on critical cultural heritage that is essential to the identity and/or cultural, ceremonial, or spiritual aspects of Indigenous Peoples lives, including natural areas with cultural and/or spiritual value such as sacred groves, sacred bodies of water and waterways, sacred trees, and sacred rocks; or
- Use of cultural heritage, including knowledge, innovations or practices of Indigenous Peoples for commercial purposes.



- FPIC is a specific right for indigenous peoples as recognised in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and ILO Convention 169/1989.
 - Free: A process that is self-directed by the community, free of coercion, expectations, intimidation, incentives or manipulation.
 - Prior: Prior means that consent has been sought sufficiently in advance of any authorization or commencement of activities and that respect is shown for time requirements of indigenous consultation/consensus processes.
 - Informed: The type of information that is provided should:
 - be accurate,
 - be in an appropriate language,
 - include information, when available, on social, economic, environmental and cultural impacts and reasons for proposed activities, duration, affected locality, proposed benefits sharing and legal arrangements and people likely to be involved,
 - be in a form that is understandable and that takes into account traditions of the community.
 - Consent: Consent must be sought and granted or withheld according to the unique formal or informal dynamic of each community.

A process for obtaining FPIC is outlined in Annex II.

6 STAKEHOLDER ENGAGEMENT PROGRAM

The disclosure of project information should be done well in advance of the start of the project. Ongoing stakeholder engagement activities ensure that stakeholders are kept informed and have an opportunity to continue a constructive dialogue about the Project and provide feedback. Updated versions of the SEP, which are under responsibility of the project implementing party, should be consulted with affected communities to achieve feedback on perception of engagement during the entire life of the project. Additionally, the implementation of the SEP will be subject to regular monitoring through the Blue Action Fund.

The tables below give a brief description of actions that have already taken place as well as actions to be taken to implement this SEP.



6.1 Stakeholder activities already undertaken

Insert stakeholder activities that have already been undertaken, e.g. formal newspaper notices, other public notices, focus groups discussions, collection of views/opinions/suggestions, receiving approval letters, disclosure of documents etc. Describe activities in as much detail as possible (e.g. where did meetings take place and when, what documents were disclosed etc.) and always with dates or time frames.

Activity	Target Stakeholder	Description	Timing



6.2 Planned Stakeholder Engagement and Disclosure

Insert planned stakeholder activities, e.g. collection of views/opinions/suggestions, receiving approval letters, disclosure of documents etc. Describe activities in as much detail as possible (e.g. Where are meetings planned, when and with whom? What documents are to be disclosed and where/when? Are the documents only disclosed as hard copies (where?) or available digitally online (include link)? What are the target groups (e.g. all stakeholders, vulnerable groups, indigenous groups, women)?

Activity	Target Stakeholder	Description	Timing



7 GRIEVANCE PROCEDURE

Each Blue Action Fund project required the set-up of a grievance mechanism by the Implementation Partner. A grievance is considered to be any complaint, comment, question, concern, suggestion about the way a project is being implemented. It may take the form of specific complaint about impacts, damages or harm caused by the Project, concerns about access to the project stakeholder engagement process or about how comments and concerns about Project activities during construction or operation, or perceived incidents or impacts have been addressed.

A Grievance Procedure specific to the Project will be developed with the following aims:

- to build and maintain trust with all stakeholders;
- to prevent adverse consequences of failure to adequately address grievances; and
- to identify and manage stakeholder concerns and thus support effective risk management.

The Grievance Procedure should be free, open and accessible to all and comments and grievances should be addressed in a fair and transparent manner. Information about the procedures, who to contact and how, will be made available on the Project website, in other materials and during stakeholder consultation.

In case of construction activities, the Implementation Partner will require its construction contractor(s) to establish a grievance mechanism for all workers. This will be included in the contracts. All workers will be informed of the grievance process and new workers will be informed when they join the Project. If existent, information on contact points will be posted on staff information boards and on site information boards. Alternatively, the Grievance Mechanism of the Implementing Partner can be made available to the workers of the contractor.

The grievance procedure comprises the following steps:

1. Identification of grievance: Stakeholders shall be able to use the following methods to submit a grievance:
 - (i) Insert applicable methods to submit a grievance, whatever is appropriate, some examples are provided below.
 - (ii) Orally (in person or via telephone) via project information hotline or Complaints Manager/Community Liaison Manager;
 - (iii) SMS/text messages;
 - (iv) Social media;
 - (v) Filling out the Grievance Form online (provide link to website); and
 - (vi) In writing via the Grievance Boxes (include the locations).
 - (vii) The grievance is recorded and classified in a 'Grievance Log' (written and electronic) by the responsible staff of the Grantee.
2. Grievance is formally acknowledged through a personal meeting, phone call, email or letter as appropriate, within 10 working days of submission. If the grievance is not well understood or if additional information is required, clarification should be sought from the complainant during this step.
3. The Complaints Manager will estimate the subject matter of this grievance and identify the risk category.
4. A response is developed by the responsible staff with input from others, as necessary. The Project might consider the establishment of a conflict resolution "committee" for the management of complex grievance issues. The set-up of this



committee should be agreed upon with the project implementing party representatives, local authorities and traditional leaders / community representatives during the establishment of the grievance mechanism.

5. Required actions are implemented to deal with the issue, and completion of these is recorded in the grievance log.
6. The response is signed-off by the responsible staff. The sign-off may be a signature on the grievance log or in correspondence that should be filed with the grievance to indicate agreement.
7. The response is communicated to the affected party; the response should be carefully coordinated. The responsible staff ensures that a suitable approach to communicating the response to the affected party is agreed and implemented. The response to a grievance will be provided 20 working days after receipt of the grievance.
8. The response of the complainant is recorded to help assess whether the grievance is closed or whether further action is needed. The responsible staff should use appropriate communication channels to confirm whether the complainant has understood and is satisfied with the response. The complainants' response should be recorded in the grievance log. Ideally, both parties should sign off the grievance to confirm closure. Or, alternatively, a written confirmation that the grievance has been closed satisfactorily should be obtained.
9. The grievance is closed with sign-off from the responsible staff, who determines whether the grievance can be closed or whether further attention and action is required. If further attention is required the responsible staff should return to Step 2 to re-assess the grievance and then take appropriate action. Once the responsible staff has assessed whether the grievance can be closed, he/she will sign off to approve closure of the grievance on the grievance log or by written communication.

A template for the Grievance Form is presented in Annex III.

If actions taken on a grievance are not resolved to the satisfaction of the complainant, a stakeholder may turn to the Blue Action Fund directly to log a grievance. Ultimately, stakeholders may turn to court in accordance with the existing legislation of the host country.

NOTE: In the event of serious complaints or those that cannot be resolved promptly, the grantees are obligated to inform the Blue Action Fund of the details. In addition, Blue Action Fund maintains a separate channel of communication open to local stakeholders in the event that issues are not being properly addressed by the grantees. The BAF's own institutional GRM will be in place by start of Q2, 2020. For the time being, KFW's Institutional Grievance Mechanism will be the key channel for grievance management³. Responsible persons for grievance management at KFW are the Complaints Management Team⁴, the responsible KFW Project Manager and the responsible KFW Environmental and Social Expert. Responsible for grievance management at the BAF is the Fund Management Team.

³ <https://www.kfw-entwicklungsbank.de/International-financing/KfW-Development-Bank/KfW-Development-Finance-Complaint-form.html>

⁴ FZ_Complaints@kfw.de



8 STAKEHOLDER REGISTER

It is important that issues raised during the consultation process are recorded in a logical and systematic way. The Stakeholder Register is essentially a database (for example, this could be set up in an Excel file). The register should record at least the following, but can be extended to document additional information, if necessary:

- Stakeholder;
- Contact details (unless requesting anonymity);
- Date of contact(s);
- Issue(s) raised (comment, suggestion, question, complaint, etc.);
- Proposed response and actions to be taken; and
- Status (recorded, active, closed).

Where many stakeholders raise similar issues these can be grouped as “issues” and responses to them will be tracked together in a separate section of the register. An appropriate cross-reference will be made in the response column in the main register.

Annex IV provides a template for a Stakeholder Register.

9 RECORDING AND MONITORING

This section presents an overview of the reports that will be used to report on and monitor stakeholder engagement activities. Monitoring will be performed on a regular basis.

Documents used for monitoring will be:

- Meeting Minutes;
- Lists of participants of stakeholder meetings (can be combined with photographs);
- Grievance Log.

10 REPORTING

The Implementation Partner will update the SEP through the lifetime of the project, in particular whenever there have been changes to the project or additional stakeholder activities or when particular milestones (agreements with communities) have been reached.

Monitoring reports, in line with the overall Blue Action Fund reporting, should be made available to affected communities concerning ongoing risks, impacts and mitigation measures.

The SEP will be part of the external overall ESMS assessment (mid term and final). This evaluation will examine the extent to which activities were implemented in accordance with the SEP, including FPIC (if applicable), and the extent to which they achieved the aims defined here. The results and any lessons learned should then be incorporated into further updates of the SEP as the project evolves.



11 Annex I: Template for Stakeholder List

[illegible]

Note: The Stakeholder List should be amended during each phase of the Project.



12 Annex II: FPIC Process

The measures outlined below describe a process to reach Free Prior Informed Consent (FPIC).

During Project Design:

- Indigenous Peoples should participate either directly or through their own freely chosen representatives and/or customary or other institutions specify which of these is entitled to express consent (or lack of) on their behalf. The objective should be to reach a collective decision (involving indigenous peoples' representative bodies and organizations e.g., councils of elders or village councils), as well as members of the affected communities of indigenous peoples; and any other local civil society organizations identified by the affected indigenous peoples' communities).
- Organize meetings where the Project and its proposed activities and the impacts and mitigation measures are explained (i.e. discussing the results of the environmental and social studies, providing translated copies of the Non-Technical Summary).
 - The meetings should be conducted in a form and language that takes the traditions of the community into account.
 - Allow time for discussion without any project staff in attendance, when the indigenous peoples can discuss whether they are prepared to provide their consent, or return at an agreed later date for this purpose.
 - The inclusion of a gender perspective and the participation of women are essential, as well as the involvement of community members of different ages as appropriate (e.g. focus group discussions).
- Recording of the consultations.
- Recording the consent or non-consent.
 - Consent will be expressed in a collective manner through community representatives. The indigenous peoples will convey their decision either in writing using a template prepared by the project implementing party or, if preferred, orally. If a document is prepared, it will be signed by the village head and will indicate that the decision was reached by consensus. The names, sex, ages, ethnic group, and occupation of each participant in the village meeting will be recorded in an annex to the document.

During Project Development and Implementation:

- Regular stakeholder meetings to determine whether the Project responded to local communities' needs and aspirations.

During Monitoring and Evaluation:

- Monitoring and evaluation will take into account indigenous peoples' issues and will evaluate whether the Project has been implemented in line with FPIC, e.g. any issues raised by indigenous peoples and agreed on with Grantee should be monitored and followed up during the Project implementation.



12.1 Plan for FPIC Process

Insert past and future activities. Describe activities in as much detail as possible (e.g. where did meetings take place and when, what documents were disclosed etc.) and always with dates or time frames. The descriptions in the table below are just an example and should be adapted to make it specific to the project and the actually undertaken and planned activities.

Activity	Target Stakeholder	Description	Timing
1. Preliminary meeting ("kick-off meeting")	Indigenous groups	Meet with Indigenous groups and agree on culturally appropriate ways to engage with them (e.g. the language the meetings will be conducted in) and a strategy to reach consent. The IPs will choose representatives (e.g. council of elders, village council, which are entitled to express the community's consent (or lack of) on their behalf.	
2. Stakeholder Meetings	Indigenous groups	Organize meetings with the IPs where the Project, its proposed activities, the impacts and mitigation measures are explained. Provide translated copies of the Non-Technical Summary. Allow time for discussion without any project staff in attendance, or return at an agreed later date for this purpose. Conduct focus group discussion in order to include the perspectives of both genders and different age groups.	
3. Recording of Consultation	Indigenous groups	Record the process, attendees, opinions, issues, agreements and other important aspects of the meetings.	
4. Monitoring and Evaluation	Indigenous groups	Monitor and evaluate that the IPs' issues are taken into account and evaluate whether the Project has been implemented in line with FPIC. Any issues raised by IPs and agreed on with the project implementing party shall be monitored and followed up on.	



13 Annex III: Template for Public Grievance Form

Adapt, if necessary. Grievance Form needs to be translated into the local language(s)

Public Grievance Form	
Reference No. (assigned by Implementation Partner):	
Please enter your contact information and grievance. This information will be dealt with confidentially. Please note: If you wish to remain anonymous, please enter your comment/grievance in the box below without indicating any contact information – your comments will still be considered by	
Full Name	
Anonymous submission	<input type="checkbox"/> I want to remain anonymous
Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By mail (please provide mailing address): <input type="checkbox"/> By telephone (please provide telephone number): <input type="checkbox"/> By e-mail (please provide e-mail address):
Preferred language for communication	<input type="checkbox"/> [insert other applicable language(s)] <input type="checkbox"/> English <input type="checkbox"/> Other, please specify: _____
Description of incident or grievance:	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
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?	

Please return grievance form to: Provide contact person and address

14 Annex IV: Template for Stakeholder Register

Stakeholder (group or individual)	Contact details	Date of meeting	Location of meeting	Summary / Issues raised	Follow up Actions	Status (closed / Open)



ANNEX D: Social Impact Assessment (SIA)

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I. Context

This document provides general guidance for conducting a Social Impact Assessment (SIA) and for preparing a SIA report. It is applicable for projects where the Environmental and Social Management System (ESMS) screening has identified a need to assess social risk and impact issues. The purpose of the SIA is to identify and analyse potential adverse impacts and to ensure that the needs and conditions of people affected by a proposed project are fully taken into account in project design and that suitable mitigation measures are identified as needed. It should also contribute to enhancing opportunities for developmental benefits for affected groups.

II. Key elements of an SIA

The key elements of a SIA report are described and illustrated below. The order and manner in which the information is presented should be based on this outline.

1. *Non-technical summary*

Summarise significant issues in a way that can be easily understood by a non-technical audience, in particular local stakeholders. The summary includes how the issues identified should be managed and any outstanding issues that require further action.

2. *Project description (up to 2 pages)*

Concisely describe the main parameters of the proposed project, including:

- The project proponent and other project participants and their respective roles in the project
- Project's geographic location, preferably illustrated with appropriate maps¹
- Summary of project intervention (project objective(s), expected results/outcomes, outputs and main activities)
- Implementation arrangements.

3. *Analysis of policy, legal, and administrative framework*

Describe the legal and regulatory framework within which the project takes place and identify any laws and regulations that pertain to social matters relevant to the project. This includes regulations about environmental and/or social impact assessments to which the project must adhere as well as laws implementing host country obligations under international law. Explain the requirements of any co-financing partners, if applicable. Where pertinent, national and international legal frameworks on gender should be taken into account. Flag any areas where the project might fall short on compliance.

4. *Stakeholder identification and analysis*

The purpose of the stakeholder identification and analysis is to clarify who should be involved in the SIA process and how. List all relevant stakeholders who have an interest in or might influence the project, disaggregated between men and women where relevant and feasible. The SIA should make use of any stakeholder analysis done during the project design process. The SIA provides an additional layer to this analysis by elaborating on potential project impacts on the identified stakeholders. This process might include identifying new stakeholders.

¹ When presenting maps, clearly mark the sites on the map that are referenced in the report.

Stakeholders should be described and analysed regarding:

- their interests in and expectations from the project;
- how they might influence the project (positively or negatively);
- how their livelihoods could be impacted by the project (positively or negatively); and
- how they should be involved in the SIA.

It is useful to present the key findings of the stakeholder analysis in a matrix.

5. *Socio-cultural, economic, historical, institutional and political context*

Describe and analyse the socio-cultural, economic, historical, institutional and political context in which the project operates. While some broader contextual information is necessary, the main analysis should focus on the immediate context of the project and the project location in order to be relevant to decisions about project design, operation, or mitigation measures. For gathering general context data consult – to the extent possible – secondary data and existing analyses, including the situation analysis carried out as a project design step. Accuracy, reliability, and sources of the data need to be specified.

This section serves two purposes. First, it provides baseline data regarding the socio-economic situation before the project commences as well as relevant anticipated developments within the project area. Second, it provides an opportunity to substantiate the results of the ESMS screening by confirming potential impacts and/or identifying other potential issues. As such it serves as a preparation for the in-depth impact analysis (see section 6).

The two lists below describe the generic topics to be covered in this section of the SIA. Other topics may be added to reflect the findings of the ESMS screening. It is critical to focus the data collection and analyses on issues relevant to the project, to relevant social groups and to areas where adverse social impacts might occur.

Socio-cultural, historic and economic context:

- Main social groups and their socio-cultural characteristics disaggregated between men and women; emphasis on indigenous peoples and vulnerable groups such as landless persons, the elderly, persons with disabilities, children, ethnic minorities or displaced persons;
- Historical events relevant to the project and potential impacts;
- Economic trends and prospects (relevant for social groups at or near the project);
- Main economic activities and livelihood patterns: formal and informal, subsistence and commercial, including dependence on natural resources or on illegal activities such as poaching or illegal trade;
- Social issues and risks faced by social groups, including issues related to access to resources and to social services as well as to their capabilities and development opportunities;
- Interests and developmental aspirations of social groups and their attitudes toward sustainable natural resource management;
- Existing or potential emerging conflicts between or among social groups that are relevant to the project.

Political, institutional and legal context:

- Institutional environment: local and central government, private sector and civil society institutions relevant to the activities proposed by the project;
- Policy and decision-making processes, stability of political systems, leadership and rule of law;
- Policies and regulations on property rights/tenure regimes, natural resource management and conservation and current practice of enforcement (in general and locally, especially at the project site);
- Capacities and capacity issues of institutions relevant to the project and to impacts;
- Issues and constraints within existing institutions and in their relationships with each other that might present barriers for the project and opportunities for overcoming these constraints.

6. Social impact assessment

Methodology of data collection and impact analysis²

Describe the data collection and impact analysis methodology used in the SIA, including

- the data collection methods and analytical tools used (e.g., qualitative versus quantitative data, mix of data from different units of analysis for triangulation of results);
- the units of analysis used for the social assessment (e.g., household level, community level or other relevant social aggregations);
- if sampling was used, rationale and criteria for sampling sites and respondents; please note that representative sampling (rather than subjective sampling) should be employed wherever possible.

When designing the research methodology, it is important to be mindful about how much time and resources the research process will require from the communities.

Identification, prediction and assessment of impacts

The SIA identifies, predicts and assesses the significance of project impacts related to the ESMS Standards as well as to other potential critical social issues identified during ESMS screening. The following impacts should be taken into consideration:

- Direct or indirect impacts occurring at the project site or within the project's wider area of influence. Indirect impacts include inadvertent knock-on effects or side-effects of the project given the complexity of social processes and the human-environment interface;
- Impacts within the project's wider area of influence including transboundary impacts, where relevant;
- Negative impacts triggered immediately as well as longer term impacts;³
- Cumulative effects that materialize through interaction with other developments at the project site as well as in the wider area of influence.

Examples of potential impacts related to the ESMS standards and other social risks are illustrated in Table 1.

² More detailed methodological guidance on conducting a SIA can be found in Vanclay et al, 2015, *Social Impact Assessment: Guidance for assessing and managing the social impacts of projects*, available at http://www.iaia.org/uploads/pdf/SIA_Guidance_Document_IAIA.pdf.

³ Although the future cannot be foreseen, the assessment should consider scenarios that are technically or scientifically robust enough to make certain predictions.

Table 1: Typical Risks Organized by ESMS Standard and Other Social Impacts

Standard on Involuntary Resettlement and Access Restrictions⁴	<ul style="list-style-type: none"> – Economic/livelihood losses through material impacts caused by restricting access to and use of natural resources (e.g. fodder, medicinal plants, fuel wood). – Livelihood losses through non-material impacts related to social, recreational, spiritual, cultural, knowledge and educational values of the land/resource to be restricted. – Impacts related to reduced access to social services such as education or health services by prohibiting or limiting physical access to places where those services are delivered.
Standard on Indigenous Peoples	<ul style="list-style-type: none"> – Disturbances of social, spiritual and cultural identity. – Potential for ethnic conflicts stimulated by project activities – for instance in a situation with conflicting resource use or conflicting cultural practices. – Inequitable or culturally inappropriate benefits provided by the project with the risk of leading to alienation or inter- or intra-community conflicts.
Standard on Cultural Heritage	<ul style="list-style-type: none"> – Damages to physical cultural resources. – Non-material impacts due to restrictions of access to cultural resource (including natural features or resource with cultural, religious or spiritual significance). – Negative impacts from the promotion or use of cultural resources.
Other social impacts	<ul style="list-style-type: none"> – Increased marginalization of groups due to project activities. – Elite capture of projects benefits or natural resources that aggravate internal differentiation. – Disturbances to patterns of social relations and community cohesion. – Perpetuation or aggravation of unequal power relations or inequalities between men and women. – Impacts on human health and safety including injuries or death through human-wildlife conflicts. – Economic losses (e.g., crops, livestock, infrastructure) through damages from wildlife.
Climate Change	<ul style="list-style-type: none"> – Increased vulnerability of local communities due to project activities failing to take climate change impacts into account.

When assessing impacts, consider social and cultural aspects that differentiate social groups such as:

- How the risk of being impacted by project activities differs by social characteristics including:
 - gender, gender roles, and gender-specific constraints;
 - ethnicity, race and class;
 - culture and language;
 - age.
- Social risks, vulnerability and security/safety issues affecting specific social groups.
- Influence of power relations of social groups on the project design and how implementing the project may affect power relations.

Wherever differences between social groups are relevant, the analysis should be broken down accordingly.

⁴ The standard covers risks of access restrictions and involuntary resettlement, but resettlement is not specifically addressed in this Guidance Note. It is dealt with in a separate Guidance Note (under development).

Impacts should be predicted in qualitative and, to the extent possible, in quantitative terms and assessed on their significance. Rather than describing environmental and social variables in isolation, demonstrate their interactions. This is important not only to better understand the full risks but also to compare potential trade-offs between conservation and social benefits.

The extent and quality of available data, key data gaps, and uncertainties associated with predictions need to be identified.

7. Analysis of alternatives

Identify other options that could achieve the project objectives and compare their impacts. This step is generally required only if the identified impacts are very significant. The analysis systematically compares feasible, less adverse alternatives – including the "no project" option – to the proposed project site, technology, design, and operation in terms of:

- their effectiveness in achieving the project objectives as well as potential trade-offs,
- their potential environmental and social impacts,
- the feasibility of mitigating these impacts,
- operational requirements and their suitability under local conditions,
- their institutional, training, and monitoring requirements,
- their estimated cost-effectiveness, and
- their conformity to existing policies, plans, laws, regulations.

The analysis should conclude with a recommendation and indication of the preferred alternative and an explanation why it was chosen.

8. Environmental and Social Management Plan (ESMP)

For each significant social impact an appropriate mitigation strategy must be developed. First, all available options should be sought to avoid impacts (e.g., through adjustment of project design, modification of protected area boundaries). If avoidance is not possible, appropriate measures to minimise the impact should be identified. Where avoidance is not possible or negative residual impacts remain after minimising, the SIA should propose methods of adequately compensating affected groups for their losses.

Compensation mechanisms must be developed in consultation with legitimate representatives of affected groups and designed in a way that they are socio-economically and culturally suitable, considering a range of options for in-kind, non-monetary and monetary compensation, as appropriate. For affected households whose livelihoods are land- or subsistence-based (e.g., depending on forest resources or grazing land), priority should be given to land-based compensation approaches (e.g., offering alternative land or access to resources of at least equal value). Forms of in-kind compensation might include supporting communities with alternative livelihood or income-earning opportunities.

The SIA report should also point out any issues for which the impact analysis has concluded that no further attention is required (e.g., because of low significance or probability). Where relevant and feasible, the SIA could also explore opportunities for social enhancement. This might include:

- opportunities to enhance the participation of men and women in the project and how to support both genders in the development of sustainable livelihood activities and in deriving social and economic benefits from the project, or
- measures to enhance social inclusion and cohesion; to address vulnerability, capacity and equity issues; to empower weak, poor and marginalised social groups; and to enhance safety and security.

Briefly describe each mitigation measure including the type of impact(s) it will address, its design, equipment requirements and operating procedures, as appropriate. Proposed mitigation measures should be technically and operationally feasible and culturally adequate. The benefits of measures should be distributed in an equitable manner across the affected population. Estimate their costs (including initial investment and recurrent expenses) and, where relevant, indicate contributions from stakeholders and beneficiaries (including in-kind). Specify institutional arrangements and any needs for development of the capacity of communities or partners to implement the proposed measures. Also specify the sustainability of the measures and whether they will continue to be effective after project funding ceases.

The measures should be presented in an Environmental and Social Management Plan (ESMP) to facilitate their integration into project management. This includes confirming their feasibility, indicating resources and costs, responsibilities, their schedule for implementation, and evidence of completion. Please refer to the ESMP Guidance Note⁵ and its templates for further details.

9. Stakeholder consultation

Stakeholder engagement is a key principle of the ESMS and an important procedural tool for a successful Environmental and Social Impact Analysis (ESIA) or SIA. It allows for improving the understanding about local conditions and stakeholders' concerns and is essential for identifying effective strategies for mitigating negative impacts. Involving affected groups in decision-making gives them more confidence and security, improves the legitimacy of the project and helps building constructive relationships among stakeholders.

The ESMS defines requirements for stakeholder engagement by establishing minimum provisions for disclosure and consultation (see sections 4.2.7 and 4.6 of the ESMS Manual).⁶ During the ESIA/SIA process, consultations should concentrate in particular on potentially affected groups, indigenous peoples and civil society organizations; the stakeholder analysis supports the decision of whom to consult. The consultation process needs to be culturally appropriate, non-discriminatory and gender sensitive; it should assure that all groups whose lives might be affected by the project are properly consulted to verify and assess the significance of impacts and that all affected groups are provided the opportunity to participate in the development of mitigation measures.

The intensity or depth of stakeholder engagement should be appropriate to the complexity of the project and tailored to individual groups taking into account the significance of the identified risks (see section 2.1.4 of the ESMS Manual). It is important to be mindful about the resource and time availability of stakeholders. The consultation process is best scheduled in iterative steps first seeking initial inputs, then feed-back on first assessment results and suggestions for mitigation actions and concluding with a final stakeholder meeting to gather feed-back on the draft of the ESIA/SIA report, the ESMP and other action plans, where relevant.

⁵ ESMS Guidance Note on Developing and Monitoring an ESMP, available at www.iucn.org/esms.

⁶ See ESMS Manual, available at www.iucn.org/esms.

If the Standards on Involuntary Resettlement and Access Restrictions or on Indigenous Peoples are triggered, consultations should fully adhere to the Free Prior and Informed Consent Principle. Guidance is provided in the ESMS Manual and in a separate Guidance Note.⁷

The ESIA/SIA report should document the results of the consultations carried out with stakeholders and project-affected groups and provide recommendations with an explanation how these results have been taken into account. The description should specify how women have been included in the consultation, taking into consideration their gender-specific knowledge, roles, responsibilities and potential impacts.

III. Specific provisions from the social ESMS standards

This chapter contains specific provisions related to the ESMS Standard on Involuntary Resettlement and Access Restrictions⁸ and the Standard on Indigenous Peoples. They are considered only if the ESMS screening has concluded that (1) the respective standard is triggered or that (2) the SIA needs to determine whether the standard is triggered.

Provisions of the Standard on Involuntary Resettlement and Access Restrictions

This standard applies to projects where the conservation objective requires restricting people's access to land or natural resources. Typical examples are interventions that involve the establishment of protected areas, expansion or alteration of boundaries or strengthening of protected-area management. Projects that trigger this standard require a more in-depth analysis of the potential impacts on social groups affected by the restrictions. Where relevant the assessment should be disaggregated by social groups and include analysing:

- their cultural and historical relationship to the resource being restricted (land and associated natural resources);
- their current rights to these resources – legal rights as well as customary and non-legally recognized rights;
- the degree of their dependency on these resources for livelihoods;
- the relationship between the use of resources and conservation objectives and the extent of their positive and negative impacts on resource sustainability.

The analysis should be contrasted with the specific conservation objective of the project and it should be critically judged whether the project's expected conservation benefits outweigh the costs and risks caused by access restriction.

To synthesise the analysis, the preparation of an inventory is recommended describing the main types of natural resources, their current use and importance for livelihoods, use rights and planned restrictions (see Annex A). Wherever relevant this should be disaggregated by social groups.

As visualized in Figure 1, the SIA is followed by the development of an Action Plan for Mitigating Impacts from Access Restriction. If time is not sufficient during the project preparation phase, this plan can be replaced with the development of an Access Restriction Mitigation Process Framework.⁹ Unless the project is very complex and triggers many other impacts (besides access

⁷ ESMS Guidance on Free, Prior and Informed Consent will be available at www.iucn.org/esms.

⁸ As mentioned in note 3 this Guidance Note covers only risks of access restrictions; resettlement is dealt with in a separate Guidance Note (under development).

⁹ See the standard for more detail as well as the separate Guidance Notes developed for the two tools at www.iucn.org/esms.

restriction) it may make sense to combine the SIA and the development of the Action Plan/Process Framework to reduce the effort and time-investment for the project-affected groups.

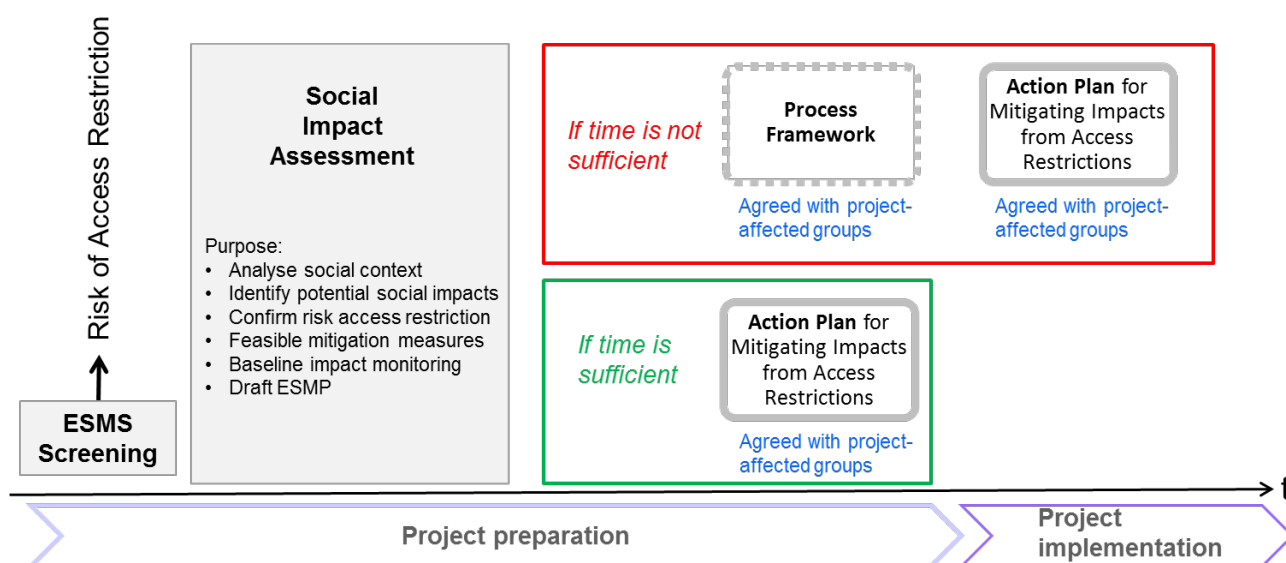


Figure 1: Process of preparing Social Impact Assessment and Action Plan for Mitigating Impacts from Access Restrictions

Provisions of the Standard on Indigenous Peoples

The Standard on Indigenous Peoples applies whenever indigenous peoples are present in a proposed project area, have collective attachment to the area or could be affected negatively by the project (even without being present at the project site). Projects that trigger the standard require a more in-depth analysis of potential impacts on indigenous peoples. Depending on the results of the ESMS screening the SIA might need to include the following:

- demographic, social, economic and cultural information on indigenous communities;
- maps showing the location of indigenous peoples' settlements and activities in relation to the project area (including sites and resources of cultural and religious significance);
- description and analysis of all forms of resource tenure and use, and of customary rights and claims to lands, territories and resources in the project area or potentially impacted by the project, and the status of recognition of these rights and claims under national legislation and administrative practices;¹⁰
- social organisation and institutions, including identification of existing rules and channels of communication that should inform the design of future consultation processes;
- systems of production (food, medicine, artefacts), including roles and rules based on gender, age, ethnicity, caste or other factors;
- local knowledge relevant to the proposed project, identification of the groups or individuals who may be the special holders of such knowledge, and determination of how it may be affected and used during project implementation.

¹⁰ If the Standard on Involuntary Resettlement and Access Restrictions is triggered, an assessment of access rights is already covered in the required analysis.

IV. Other items to be specified in the terms of reference for an SIA

The actual terms of reference for a SIA must be adapted and tailored to each situation. The scope and depth of the assessment depend on the nature, complexity and significance of the issues emerging from the ESMS screening. The terms of reference for a SIA usually includes the following items:

- A summary of the main project features (with location map)
- A list of applicable national ESIA requirements, if applicable
- A list of the key issues that emerged from the ESMS screening to be analysed in the SIA
- A description of the required elements of the SIA report (see Chapter II, 1-9) and requirements for preparing any other documents and action plans
- Methodological guidance (if applicable) for the overall SIA and required specialist studies (e.g. gender responsive analysis)
- Specification of the type of social expertise required by the SIA expert/team
- Specification of required consultations with affected people, communities and other parties
- A budget and schedule for the SIA providing sufficient time and funds for effective stakeholder consultation.

Carrying out the SIA requires a technical team with appropriate qualifications (preferably social science backgrounds) and relevant experience in the field of social impact assessment. The team should include experience with participatory consultation methodologies, with gender analysis and gender responsive project design and, if relevant, with indigenous peoples' issues.

Annex A: Inventory of natural resources and access restrictions

The table below provides a template for creating an inventory of natural resources. The inventory is a first step for analysing livelihood impacts when a project's conservation objectives require use restrictions for certain natural resources.

The table shows resources for illustrative purposes; some may not be relevant for the project (and should hence be removed), others may be added depending on the livelihood context. In the first row the current use of the resource is described and its importance for the livelihood of local communities/groups. The second row indicates the sites where the resources are currently gathered. The template distinguishes three zones (core, buffer and community use zone), but this can be adjusted as needed. The third row asks for specifying current use rights for the each resource. Where relevant disaggregate the analysis of importance, resource use practices and rights between social groups (e.g., indigenous peoples, women, vulnerable groups). The last row describes restrictions planned by the project and the relevant zones. It is important to use a broad interpretation of access restrictions considering not only the actual establishment of restrictions but also project activities that would strengthen enforcement of existing restrictions or changes boundaries of use zones.

Resource			Conservation zone	Buffer zone	Community use zone
Timber	1	Importance for livelihoods			
	2	Current sites of gathering/harvesting			
	3	Use rights (formal & customary)			
	4	Restrictions triggered by project			
Construction materials	1	Importance for livelihoods			
	2	Current sites of gathering/harvesting			
	3	Use rights (formal & customary)			
	4	Restrictions triggered by project			
Fuel wood	1	Importance for livelihoods			
	2	Current sites of gathering/harvesting			
	3	Use rights (formal & customary)			
	4	Restriction triggered by project			
Grazing livestock	1	Importance for livelihoods			
	2	Current sites of gathering/harvesting			
	3	Use rights (formal & customary)			
	4	Restrictions triggered by project			
Medicinal plants	1	Importance for livelihoods			
	2	Current sites of gathering/harvesting			
	3	Use rights (formal & customary)			
	4	Restrictions triggered by project			
Bushmeat / wild game	1	Importance for livelihoods			
	2	Current sites of gathering/harvesting			
	3	Use rights (formal & customary)			
	4	Restrictions triggered by project			



Environmental & Social Management System (ESMS)

Annex E Environmental and Social Assessment (ESA)

September 2019



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1 Purpose

This Environmental & Social Assessment (ESA) template provides guidance on the elements to be included in further documentation required for projects classified as Category B by the Blue Action Fund. If an Environmental and Social Impact Assessment (ESIA) or similar assessment has already been prepared for the Project, for example under the national environmental and social assessment procedure, this document can be handed in instead.

It is the responsibility of the Grantee to provide sufficient and qualified environmental and social (E&S) capacities (either in-house or external) to complete this document.

The following sections include instructions and information on the content and input that needs to be provided/obtained by the party completing the further studies/documentation which are highlighted in grey and italics.

The structure and content can be modified as necessary by the party completing the template to address the identified risks as deemed suitable by best professional judgement and therefore should not be seen as compulsory. In other words, the E&S Assessment only needs to contain those sections that are applicable to the project and to a level of detail that is appropriate for describing the relevant E&S topics.

2 Project Information

Please provide a short description of the project, also including, but not limited to:

- Project name
- Implementation partner
- By whom was the ESA prepared
- Project location (ideally with a map)
- Key components of the project , including any associated facilities (temporary and permanent)
- Definition of Project Area of Influence
- Summary of overall geographical, ecological, social context
- Maps and layout drawings

3 METHODOLOGY

The methodology should be described comprising the following topic.

3.1 E&S Assessment Justification

The ESA should focus on the issues that are most important for design, decision-making and stakeholder interests. E&S risks and impacts that need to be further assessed in this report have been identified during the screening and categorization exercise. The issues that require the preparation of an ESA are:

Insert here criteria for Categorization of the Project as per the E&S Questionnaire & Screening Report: e.g. construction inside marine protected area, impacts on the biological, socio-economic or cultural environment, land use change, resettlement (e.g. livelihoods impacts),



health & safety issues (occupational or community), impacts on Indigenous Peoples or vulnerable groups, etc.

Insert information on the analysis of alternatives, which finally lead to the current project layout and design.

3.2 National Permitting

List all permits that are required by the host country to carry out the project. Provide status of the permit or document and information of steps to be taken to acquire the permits to implement the project – if any. The list should also cover any project relevant international environmental treaties and agreements to which the host country is a party.

Permit / Document	Status	Actions

4 BASELINE CONDITIONS

The baseline conditions provide the context within which the impacts of the project can be assessed, a description of physical, biological, human / socio-economic and cultural conditions (as applicable for this assessment) within the project area. The baseline should include information on all E&S issue that were identified the “E&S Assessment Justification” section.

4.1 Sources of information

Possible information sources for the ESA could be (please cite sources in the applicable chapters):

- Site visit (with date, scope, persons met);
- Technical /engineering documents;
- Publicly available source of information;
- Consultation with key informants/ specialists (e.g. NGOs, experts, authorities, universities, consultants etc.);
- Sample analysis (what, how, by whom, when, where);
- Professional judgement;
- etc.

4.2 Physical Environment

Provide details on the physical environment specific to the project area and, as detailed as possible, ideally with quantitative information and specific to the project area, for example on:

- Key landscape/seascape features: islands, beaches, coral reef, lagoon, river, mangroves, rainforest etc., this could also include habitat maps
- Ecosystem types.



- Climate and meteorology (temperatures, storms, rains etc. that are important to consider).
- Natural resources with economical interest (forests, tourism areas, offshore wind, offshore oil/gas etc.).

4.3 Biological Environment

Provide details on the biological environment specific to the project area and as detailed as possible, ideally with quantitative information and specific for example on:

- Biodiversity: flora /fauna species found in the area with their respective protection status as per national and international (IUCN Red List or similar) standards.
- Any habitat fragile or needing specific consideration in the area (dunes, mangroves, estuaries, tidal flats, coral reefs, sea grass, etc.).
- Location of the next protected areas or buffer zones per national or international status.

4.4 Human, Socio-Economic and Cultural Environment

Provide details on the human, socio-economic and cultural environment specific to the project area and as detailed as possible, ideally with quantitative information and specific, for example:

- Demographic data: population, ethnicity, religion, age.
- Villages, dwellings, social infrastructure in the area.
- Utilities (power, roads/tracks, health/education/administration infrastructure, water and sanitation etc).
- Main economic activities in the areas / livelihoods patterns.
- Livelihood associated natural resources (fishing, seaweed collection, forests, hunting) with economic interest to be considered (ecosystem services).
- Places of spiritual, social, cultural, religious or historical/archaeological interest to be considered in the area.
- Human challenges to be considered (conflicts, threats).
- Any other projects that could either influence this project, be influenced by this project or lead to similar impacts on the receptors.

4.5 Land Issues

Document and record all the information concerning the acquisition of land, including at least the following:

- Previous site use (e.g. greenfield or brownfield);
- Land use and conversion (residential, industrial, agricultural area etc.);
- Land status (e.g. protected area, high ecological value area);
- Land ownership (private, community, public, non-formal ownership etc.);
- Total land used;

The land agreements (private land owners, land donation, informal ownership rights) should also be documented and in case of public land acquired the compensation issues should be recorded and the need of further documentation should be identified, as mentioned in the Screening Checklist.

In case there is no land acquisition related to the Project, please confirm briefly.



5 Stakeholder Engagement, Public Disclosure and Grievance Management

Please summarize the key contents of the Stakeholder Engagement Plan for the Project and elaborate on how engagement has been undertaken during the ESIA Process. Please also describe how stakeholders' contributions, aspirations and concerns were integrated in the Final Version of the ESIA and the resulting environmental and social management plans. Add a list of stakeholder events including participants and records of meetings as Annex to the ESIA. Please also describe the provisions for public information and disclosure of the Draft ESIA, including measures to present the ESIA in a non-technical, culturally appropriate manner. The description of the project's grievance mechanism and the avenues to submit grievances directly to the BAF should be part of this chapter as well.

6 IMPACT ASSESSMENT

Please apply following methodology for the impact assessment for the identified relevant topics during the baseline description:

1. Impact assessment: to determine if the project and the associated activities could potentially impact the resources/receptors, to evaluate the significance of the predicted impacts by considering their magnitude and likelihood of occurrence, the sensitivity, value and/or importance of the affected resource/receptor. Transboundary and cumulative impacts should be identified during this stage (if any).
2. Mitigation and enhancement: to identify appropriate and justified measures to mitigate negative impacts and enhance positive impacts.
3. Residual impact evaluation: to evaluate the significance of impacts assuming effective implementation of mitigation and enhancement measures.

6.1 Prediction and Assessment of Impacts

Based on the baseline describe here for each identified topic:

- How the project is likely to adversely affect the different components of the environment and which benefits could potentially be raised by the project?
- How the environment may be affected by the project?
- How the project is likely to contribute to cumulative impacts (cumulated effects originating from different activities that would have similar impacts on same receptors)?
- Is there a likeliness of transboundary impacts?

Evaluate the significance of the predicted impacts by considering their magnitude and likelihood of occurrence, and the sensitivity, value and/or importance of the affected resource/receptor.

6.2 Recommended Mitigation Measures

Identify appropriate and justified measures to mitigate negative impacts and enhance positive impacts.

Determine the relevant mitigation measures for a project-specific ESMP. This could be done in text form, bullet lists or table format or a combination of these.

6.3 Residual impact assessment conclusions

Insert a discussion of the outcome of the assessment once mitigation measures are assumed to have been applied and if specific impacts cannot be mitigated or outstanding impacts remain



despite the measures applied. The discussion should be clear about which aspects of the impact have been affected by the implementation of the specific mitigation measure.

7 MANAGEMENT & MONITORING

A project-specific Environmental and Social Management Plan (ESMP) needs to be prepared. The mitigation measure need to be based on the baseline and impact assessment. Annex G – ESMP for Small Construction – can be used as a guidance to prepare a project-specific ESMP.

Topic	Mitigation Measure	Means of Verification	Responsibility	Monitoring Procedure

This section should also explain roles and responsibilities for the implementation of the ESMP, including monitoring. Please also include an implementation schedule of ESMP measures corresponding to the overall project schedule (e.g. project construction works). Please also include estimates in capital and recurrent costs and funding sources for the implementation of the ESMP.





Environmental & Social Management System (ESMS)

Annex F Process Framework, Livelihood Restoration Plan

September 2019



Introduction

This document serves as a guidance for a Process Framework. This guidance is based on the Guidance Note for the World Bank's Environmental and Social Standard (ESS) 5¹ as well as the IUCN Standard on Involuntary Resettlement and Access Restrictions.² Annex D (Social Impact Assessment Guidance), which is adopted from the IUCN ESMS, also contains a short overview regarding Access Restriction in Section III.

Process Framework

Where projects may restrict communities' access to natural resources (on land or water) in legally designated parks and protected areas a Process Framework needs to be prepared. In order to assess, mitigate and manage impacts of access restriction a Process Framework needs to be developed. This should include:

- Short Project Description
 - Which components/activities of the project will cause access restriction and on what resources?
 - Are the restrictions seasonal?
- Description of the communities, including
 - customary approach to natural resources management (e.g. current livelihood system), also reflecting the seasonality,
 - the degree of the communities' dependency on the natural resources.
- A land / marine tenure assessment, including a description of
 - the formal / legal tenure system (national legislation),
 - the informal tenure system (customary).
- Assessment of the (customary) boundaries /areas used by the community
 - This might also include the confirmation of the boundaries of the limited/no-take zones with the communities (e.g. through a mapping exercise), or the reconfirmation in case of already existing zones/marine protected areas. This process also needs to be documented (agreements, maps).
- Description of the Marine Protected Area (MPA) Management
 - Is a Management Plan in place?
 - Is artisanal fishery allowed in the MPA?
 - Are local fishermen involved in the management of the MPA?
 - How well is the Management Plan enforced?
 - Description of illegal activities.
- Description of the anticipated positive and negative impacts
- Land / Sea Use Agreements or other Conservation Agreements
- Description and documentation of the participatory process
 - In order to ensure that the access restriction is voluntary, the stakeholder engagement process and the outcomes have to be well documented. If indigenous peoples are involved, this process needs to apply the principle of free, prior and informed consent (FPIC) as outlined in the Stakeholder Engagement Plan in Annex C.
- Criteria for eligibility of beneficiaries and affected people

¹ [World Bank ESS](#)

² [IUCN Standard involuntary Resettlement and Access Restriction](#)



- This also needs to be undertaken via a participatory approach (involve communities in identifying the adverse impacts, assessing the significance of the impacts, establishing the eligibility criteria for mitigation and compensation)
- Mitigation Measures
 - Measures need to be aimed to restore or improve livelihoods.
 - Consider long-term and short-term measures, depending on the kind of access restriction and potential impacts.
 - Are measures only required during a certain season?
 - Are the measures attractive enough to discourage illegal activities?
- Monitoring

The requirement to develop a Process Framework does not apply to restrictions of access to natural resources under community-based natural resource management projects, i.e., where the community using the resources collectively decides to restrict access to these resources, provided that an assessment satisfactory to the Blue Action Fund establishes that the community decision-making process is adequate and reflects voluntary, informed consensus, and that appropriate measures have been agreed and put in place to mitigate adverse impacts, if any, on the vulnerable members of the community.

Guidance for the Development of a Livelihood Restoration Plan

As a key aspect of this guidance, it is important to highlight the distinction between livelihood restoration and community development, as it is anticipated that a number of potential projects will require a combination of both measures.

Livelihood restoration is a primary requirement of international standards on displacement and resettlement (WB ESS 5, IFC PS 5) and is expected to fully mitigate project impacts on displaced persons' livelihoods, and ensure that people are, at a minimum, able to sustain the same quality of life as they did prior to resettlement.

Livelihood restoration efforts are distinct from community development activities, which encompass a broader set of social impact mitigation efforts and social investments. Community development interventions must align closely with project goals and should increase community resilience by supporting their overall social, economic, and general well-being. As such, community development is more far-reaching and holistic than livelihood restoration.

General Principles for Livelihood Restoration

- Plan and Negotiate Livelihood Restoration and Improvement Activities with Displaced Persons – Sustainable livelihoods are complex, so restoration and improvement activities cannot be purely technical exercises. They require a high level of interaction with displaced people as well as communities facing land restrictions in order to develop the most feasible and desirable solutions
- *Livelihood Restoration is Individual* – Restoration activities should be planned to consider each individual context in order to ensure that no person will suffer a project-induced economic loss
- Build Off Existing Momentum – Existing livelihood systems have evolved and adapted to particular environmental, socio-economic, and cultural circumstances over a long time period. Livelihood displacement may have complex, unpredictable, and often



immeasurable effects. As such, even lower-risk livelihood interventions are not guaranteed to succeed. Therefore, livelihood interventions should be based on initiatives and practices employed elsewhere in the area.

- Prioritise Replacement of Existing Livelihood Activities – Subject to consultations with displaced persons, livelihood mitigation measures should be planned according to the following hierarchy:
 - Category 1 – Restoration of Existing Livelihoods: Normally, the lowest risk option is to re-establish existing livelihoods so displaced persons can continue doing what they know best and what is known to work in the local situation. While there may be opportunities to introduce proven enhancements, replacement of livelihood assets with new assets of at least equal quality should be emphasized so there is little risk of failure due to technical, economic, or social factors. Even if, for any reason, displaced persons choose not to continue their previous activities, it is important that they were provided with all the means to do so
 - Category 2 – Intensification of Existing Livelihoods: Emphasis should be placed on establishing permanent, sustainable intensification of existing livelihoods. Interventions should be identified for which there are successful precedents under comparable conditions and that have the fewest identifiable risk factors since any technical intervention is not guaranteed to be successful. Consultation and experimentation through pilot programs will improve the chances of success and tailored capacity building would be an incremental part of these measures.
 - Category 3 – Introduction of Alternative Livelihoods: Substituting a new type of livelihood (for example, managing a business) for an existing one (for example, fishing) should only be considered when there is no feasible way to restore existing livelihood means. Developing new livelihoods carries much higher failure risks than restoring or intensifying existing livelihoods. Usually, the factors needed to maintain existing livelihoods can be identified with some confidence. However, when developing new livelihoods, even with the best planning, it may not be possible to ensure that all the technical, economic, human, and intangible factors are in place for the new activities to be successful and self-sustaining. If a new livelihood activity is only partially successful, then the goal of restoring livelihoods of all displaced persons may not be met. The promotion of alternative livelihoods may only be appropriate under livelihood improvement and community development programs, which are not intended to mitigate specific economic losses for specific individuals. Displaced households themselves should suggest any new livelihood methods.

Livelihood Restoration Planning should be grounded on solid baseline information and be subject to continuous monitoring and corrective actions, if monitoring results would suggest so. The following aspects should guide the establishment of baseline information for livelihood restoration plans:

Livelihoods Assets and Capabilities

- Provide an outline of household assets and capabilities showing what and how households respond to shocks and stresses
- Provide detail of what makes them resilient and provide a summary of the types of livelihoods assets they have and rely on.

Livelihoods Needs Assessment

- Conduct a needs assessment for each household. This should be based on the existing and up-to-date baseline data. Consider that e.g. World Bank guidance indicates that when over 20% of productive resources are impacted, affected households should



receive additional assistance and this may be the basis for assessing eligibility for livelihood programs – but note that this is a guide, not a clear cut-off point

- Ensure that vulnerable and potentially vulnerable households will be eligible to be fast-tracked onto the livelihood program where possible.

Proposed Livelihood Programme Components

- Provide detail on the interventions that will support the predominant livelihood strategies in the Project area
- Explain if transitional hardship assistance for identified vulnerable households will also be available
- Ensure that any capacity building interventions are specified
- Mention where potential partners in delivery will be identified, including Community-Based Organizations and NGOs
- Explain that the program components will be reconfirmed and agreed with government, communities and key stakeholders
- For each proposed programme include the following:
 - Expected result
 - Programme description
 - Justification
 - Cost

Livelihood Programme Management, Implementation and Partnership

- Provide detail of the development partnerships that will be used to deliver the livelihoods programme (e.g. NGOs, CSOs)
- Detail government and other agency roles and responsibilities for involvement in delivery
- Explain how the programme will be managed internally by the project for the duration of the livelihoods program

Monitoring and Development of Indicators

- Develop objectively verifiable indicators to measure implementation progress
- Focus on outcomes, as well as outputs

Schedule and Budget

- The livelihood programme schedule, and indeed the overall Process Framework schedule, must be fully integrated with overall project scheduling
- A detailed livelihoods budget can only be developed following the costing of programs in detail with delivery partners





Environmental & Social Management System (ESMS)

Annex G Environmental & Social Management Plan (ESMP) Small Construction

September 2019



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Acronyms and Abbreviations

E&S	Environmental & Social
ESMP	Environmental & Social Management Plan
H&S	Health & Safety
IFC	International Finance Corporation
ILO	International Labour Organization
OHS	Occupational Health & Safety
PPE	Personal Protective Equipment



1 Purpose

This document serves as Environmental and Social Management Plan (ESMP) template, capturing the typical environmental and social (E&S) impacts and associated mitigation measures that need to be considered for Blue Action Fund projects that include small construction activities (e.g. ranger offices, pier etc). The grantee - together with the contractor, if applicable - shall use this ESMP document as guidance and, ideally, amend it to the specifications of the construction activities, characteristics and risks as part of the terms of reference and contract. The ESMP summarises the key mitigation measures for small construction activities and per phase (planning, construction/implementation, operation).

Small construction activities can have potential negative impacts, which depend on the project type and scale, sensitivity of site, the nature, significance, magnitude and duration of its potential E&S impacts, complexity of issues raised and reliability of mitigation. Small construction projects generally include overall intense labour work, while heavy machinery is absent, taking place at a community level.

In the context of the Blue Action Fund, small construction activities are likely to include ranger offices, research or monitoring facilities, jetty, fish processing or storage facilities, tourism facilities, and are assumed to be of low E&S risk. These construction activities, with few or no adverse risks and impacts and issues, will not require a full environmental and social assessment and their impacts can be easily and fully mitigated through routine measures and incorporation of best practices.

The ESMP should include chapters on the following topics:

- Description of construction activities,
- Roles and responsibilities,
- Training requirements,
- Monitoring and reporting.

The main part of the ESMP comprises the mitigation measures with the according means of verification (indicators), responsibilities and the means of monitoring. As a minimum, for any small construction project, this ESMP can be used as it is. Ideally, the measures in the ESMP table below (Chapter 3) should be adapted to become specific to the construction activity, meaning that measures that are not applicable can be deleted and additional measures are added.

Not listed in this ESMP are the measures that are valid for all project types as described in the main text of the Blue Action Fund ESMS; these are:

- Stakeholder Engagement, including the Grievance Mechanism (see also Annex C of ESMS),
- Workers Health & Safety, including Incident Reporting,
- Minimum Labour Standards.
- The intention of the ESMP is to guide the grantee or any other responsible entity for a specific small construction project in avoiding/mitigating negative E&S impacts during the planning and implementation phases of the Blue Action Fund Project.

The grantee will typically engage a construction contractor to undertake the works. This ESMP should be included as an annex in the contract between the grantee or its partners and the contractor as his obligation to implement the ESMP during the works.

The ESMP is typically divided into three phases



- I. preparation phase (conception, planning),
- II. implementation/ construction phase and
- III. operation phase.

Each phase is further divided into project relevant topics, whereas each topic should provide specific measures, along with means of verification, the provision of responsibilities and a short description of appropriate monitoring procedures.

Larger construction projects might require an Environmental and Social Assessment (ESA), or even an Environmental and Social Impact Assessment (ESIA), which will inform a more specific list of mitigation measures. The ESMP table below can also be used as a starting point to prepare a more comprehensive ESIA.

2 WHO NEEDS TO FOLLOW THIS ESMP?

The implementation of this ESMP will be a mandatory part of the contract between the Blue Action Fund Grantee (or its partners) and the contractor. The contractor will be obliged to support the preparation and ensure the implementation of the ESMP and the respective reporting. The Grantee will monitor the ESMP implementation and will have ultimate responsibility for it. The mitigation measures, responsibilities and monitoring requirements need to be further conveyed to any sub-contractors engaged by the contractor and/or any suppliers associated with his operations. It is the responsibility of the contractor that every worker and subcontractor on the ground needs to be aware of the content of the ESMP and the specific responsibilities under it.



3 MEASURES FOR SMALL CONSTRUCTION ACTIVITIES

The ESMP table below serves as a template and can be adapted to make it more specific to a particular project. This is the minimum of measures that need to be considered for small construction activities. As part of the process to make the ESMP project specific, for the monitoring procedures as described in the table below, please determine the corresponding frequency for each measure and integrate the costs for each measure as well.

Phase	Topic	Measure	Means of Verification	Responsibility	Monitoring Procedure/Frequencies and Budget
Preparation (conception, planning)	E&S Risk Management & Project siting	<ul style="list-style-type: none"> Define and assign Environmental & Social (E&S) requirements and responsibilities for the construction project Make sure that the Contractor has experience in dealing with E&S management. Give authority for stop of works if non-conformities are identified Build as far as practical and relevant from neighbours' residences and sensible receptors (schools, hospitals). Plan the project to avoid <ul style="list-style-type: none"> Environmentally sensible areas, such as wetlands, and places near protected areas (buffer zones) or underrated forests Areas prone to natural disasters or places of cultural and social interest Cultivated lands and grazing areas Crossing of critical aquatic habitat (e.g. watercourses, wetlands, and riparian areas), as well as fish spawning habitat, and critical fish over-wintering habitat Known areas of historical/cultural/archaeological interest Rivers and streams as well as flooded areas (consider seasonal variations) Long downhill stretches and slopes above 10%. When possible, roads should follow hill contours Land acquisition or impact on livelihoods Consider all associated facilities throughout the E&S risk management activities, such as: <ul style="list-style-type: none"> All sources of materials, such as quarries for backfill material, sand, gravel etc. All temporary facilities used for construction, such as material storage areas, vehicle parking etc. 	Project application / Project concept Contractor's resume and past ESHS experience in similar projects	Grantee	Construction reports Review once prior to selection of Site Manager



ESMP Small Construction

Phase	Topic	Measure	Means of Verification	Responsibility	Monitoring Procedure/Frequencies and Budget
	Project siting	<ul style="list-style-type: none"> Identify risks linked to the previous use of the site, such as soil contaminations, and have the source of contamination removed before construction can start. Minimise impacts on flora/fauna by a suitable selection of the exact project site Schedule activities to avoid breeding and nesting seasons for any identified critically endangered or endangered wildlife species. 	Project application Site Observations	Grantee Contractor	Construction reports Site inspections
	Project design	<ul style="list-style-type: none"> Identify and comply all applicable laws, permitting requirements and regulations against national legislation and World Bank's Environmental, Health & Safety standards Adjust this ESMP to the specific project, define the frequency of the monitoring procedure and identify if further Management Plans have to be prepared Apply low-maintenance solutions in the design of buildings, e.g. based on other buildings of the same type in the region. Include provisions for maintenance of roads and drainage system. The maintenance requirements should be doable in the local context (either by authorities or by communities). <ul style="list-style-type: none"> Finalize maintenance agreements with local communities before beginning construction Ensure that key/ routine maintenance and operations can be implemented by the community/beneficiaries. Account for proper ventilation and adequate resistance to severe weather or natural disasters. Consider as relevant the emergency preparedness in the planning of buildings, such as provision for fire emergency evacuation. 	Project application / Project concept	Grantee	Construction reports
	Project design	<ul style="list-style-type: none"> Ensure local communities are preferred for the supply of goods and services to the Project and Project personnel, where appropriate. <ul style="list-style-type: none"> If materials and competences are available locally, they should be sourced locally provided it does not disturb local economy. 	Site observations	Grantee	Random site inspection
	Project design	<ul style="list-style-type: none"> Engage with communities and authorities at the earliest stage to understand the land ownership and land use situation. Engage with the local community and potential affected households to understand their needs and identify the risk of damage to their livelihood basis through the Project 	Minutes of Meetings	Grantee	Project planning documents
	Indigenous People &	<ul style="list-style-type: none"> Engage/ communicate with communities and plan sufficient time for participation. Ensure regular consultations with the local authorities and 	Project Documentation Stakeholder	Grantee	Document review Grievance records



ESMP Small Construction

Phase	Topic	Measure	Means of Verification	Responsibility	Monitoring Procedure/Frequencies and Budget
	Stakeholder Engagement	<ul style="list-style-type: none"> communities regarding the management of construction. On-going consultation processes should identify marginalized groups, including Indigenous People as per IFC definition 	Engagement Minutes		
	Grievance Mechanism	<ul style="list-style-type: none"> Document all grievances from workers, communities and other stakeholders formulated on a register along with the responses given. Anonymity, if required, shall be guaranteed. 	Grievance Mechanism	Grantee	Review of grievance register
	Occupational Health & Safety	<ul style="list-style-type: none"> Ensure that all workers, suppliers and possible subcontractors are familiar and comply with the requirements and specifications of this ESMP Sensitize Implementing Partners on Occupational Health & Safety. Provide H&S Induction and Training and awareness to the workforce regarding H&S risks and mitigation measures (including indirect workers) tailored to project scope Ensure reporting of incidents and accidents 	Trainings record. Incident documentation. Project reporting. Grievance Mechanism in place and grievances recorded	Grantee Contractor	Check Training records Check incidents reports Review of Contracts to ensure that project requirements are included
Implementation / Construction	Grievance Mechanism	<ul style="list-style-type: none"> Ensure that all direct and indirect workers have access to and are aware about the Grievance Mechanism where they can raise workplace relevant complaints anonymously Document all grievances from workers, communities and other stakeholders formulated on a register along with the responses given. 	Grievance Mechanism	Grantee Contractor	Review of grievance register
	Labour Conditions	<ul style="list-style-type: none"> Ensure minimum legal labour standards as per ILO regulations (child/forced labour, sexual assault, no discrimination, equal opportunities, working hours, minimum wages) are met. Contribution from community in the form labour is allowed, provided that contribution is voluntary and does not negatively affect livelihoods. 	Grievance Mechanism	Contractor	Inspection reports (also from labour authorities), Review of grievance register and training records
	Labour Conditions	<ul style="list-style-type: none"> Ensure the workforce has access to primary healthcare on site, providing prescriptions. As a minimum, first aid kits need to be available on every construction site. Emergency services (next hospital, health centre or doctor) needs to be identified and made available to workers in case of need. Ensure provision of Health and Safety and hygienic and sanitary facilities at the site, including shaded welfare areas, bathrooms, 	Observations Grievance Mechanism	Contractor	Random site inspection



ESMP Small Construction

Phase	Topic	Measure	Means of Verification	Responsibility	Monitoring Procedure/Frequencies and Budget
		changing rooms and potable water. <ul style="list-style-type: none"> Ensure toilets and changing rooms are separated between male and female employees. 			
	Occupational Health & Safety	<ul style="list-style-type: none"> Provide H&S training to contractors and workers on the main risks on workers' health and safety related to work place, the safe work practices, the emergency procedures and the requirement of incident reporting. Ensure the use of Personal Protective Equipment (PPE) tailored to the conditions workers are exposed to. <ul style="list-style-type: none"> As a minimum foot plus head, hand, ear, eyes protection, depending on working position. 	Minutes of Meetings Observations Appropriate H&S and sanitary facilities provided at site	Contractor Grantee	Check Training records Check incidents reports Regular inspection Review of grievance records
	Occupational Health & Safety	<ul style="list-style-type: none"> Record accidents and near misses continuously. Implement incentive programme for incident recording. 	Trainings record. Incident documentation. Project reporting.	Contractor Grantee	Check Training records Check incidents reports
	Biodiversity and Natural Habitats	<ul style="list-style-type: none"> Limit vegetation clearing to areas within the site boundary where it is absolutely necessary to reduce habitat disturbance Ensure revegetation of cleared areas (with recovered plants and other appropriate local flora) where possible after construction using native species Ensure that the construction stays out of surrounding wetland areas 	Vegetation clearing minimal Check pre-construction survey to make sure that site is not in wetland areas	Contractor	Random site inspection
	Emissions (dust, noise, gases)	<ul style="list-style-type: none"> Reduce source of dust emissions at construction sites by watering of transportation roads during dry and windy conditions. <ul style="list-style-type: none"> Generally keep roads in good condition. Cover truck loads with canvas to avoid dust blow. Using equipment and vehicles in appropriate technical conditions. Ensure vehicles and equipment are switched off when not in use. 	Observations	Contractor	Random site inspection, inspection of roads
	Noise and vibration impacts	<ul style="list-style-type: none"> Reduce noise and vibration impacts during construction. Limit the hours of operation for specific pieces of equipment or operations, especially mobile sources operating through community areas or close to residential houses. 	No work conducted at night (between 10pm and	Contractor	Random site inspection, Review of filed grievances, review of timesheets of workers



ESMP Small Construction

Phase	Topic	Measure	Means of Verification	Responsibility	Monitoring Procedure/Frequencies and Budget
		<ul style="list-style-type: none"> Avoid vehicle movements at night. Use of modern, state-of-the-art technology and limit the number of machines operated simultaneously. 	7am) Grievance Mechanism		
	Soil and groundwater contamination	<ul style="list-style-type: none"> Maintain high standards in general housekeeping on site. Identify and store appropriately all material or hazardous substances like fuel or chemicals and provide solutions to remediate unforeseen leakage and spills. Enforce appropriate waste management practices <ul style="list-style-type: none"> Give priority to reuse of waste material upon disposal. Collect and segregate wastes and ensure safe storage and in line with legal requirements. 	Dedicated storage areas in place Waste Manifests	Contractor	Random site inspection, Review of waste inventories
	Soil Management	<ul style="list-style-type: none"> Implement best practices for soil management Ensure appropriate storing of topsoil removed. After construction, topsoil will be used as backfill for restoration of the area. Limit stockpile height to 2 m maximum to avoid soil compensation. If construction takes place on inclined surfaces/slopes, ensure preventive erosion control measures are applied (e.g. plan to retain trees and other vegetation) Reinstate the construction working area to the best possible after construction activities are completed 	Topsoil stored and re-used	Contractor	Random site inspection
	Water Resources Protection	<ul style="list-style-type: none"> Implement best practices for water management Prioritise the use of rainwater/storm water over surface water/groundwater abstraction by using harvesting equipment and systems on site. Reuse wastewater wherever feasible. Restrict excavation activities during periods of intense rainfall. 	Water harvesting conducted, No excavation during intense rainfall, Project application / Project concept	Contractor	Random site inspection, Project planning documents
	Community Health & Safety	<ul style="list-style-type: none"> Implement good practices for traffic safety Schedule traffic activities to avoid peak hours on local roads if feasible. Ensure safe driving by Project personnel, e.g. through training/induction/incentives (best driver awards). Ensure all H&S related incidents (e.g. observations, accidents) on 	Observations Training attendance lists Grievance Mechanism Incident	Contractor	Random site inspection Check incident/accident records



ESMP Small Construction

Phase	Topic	Measure	Means of Verification	Responsibility	Monitoring Procedure/Frequencies and Budget
Operation		site are recorded and followed up properly.	recording process in place		
	Community Health & Safety	<ul style="list-style-type: none"> Restrict access to construction sites to non-authorized persons Prevent physical access to the site fencing and/or guarding Use appropriate signage 	Access controlled	Grantee	Random site inspection
	Cultural Heritage	<ul style="list-style-type: none"> Ensure all chance finds of cultural heritage (e.g. graves, old ceramic, old building fragments) are reported immediately to the relevant authority. If possible, avoid excavation in the ultimate neighbourhood of a chance find, fence the chance find and await instructions from the competent authority 	Contractual documentation Chance finds records	Contractor Grantee	Random site inspection
	Community Health & Safety	<ul style="list-style-type: none"> Ensure that a Grievance Mechanism is in place were the workforce or the community can raise relevant complaints anonymously Target signage and outreach activities to improve public awareness of traffic changes and potential hazards for high-risk sections of public roads, including near the site and laydown areas. Ensure safe driving by Project personnel (e.g. through training/induction). 	Grievance Mechanism Warning signs Minutes of Meetings Driver Training Records as part of Induction training	Grantee Contractor	Review of grievance register Inspection of traffic routes Review of training records
	Waste Management	<ul style="list-style-type: none"> Implement relevant waste management procedures 	Waste management procedure in place	Contractor or recipient of buildings	Review of procedure, Random site inspection





Environmental & Social Management System (ESMS)

Annex H Health and Safety Plan

May 2019



HEALTH & SAFETY PLAN – MINOR CONSTRUCTION ACTIVITIES

This Health & Safety Plan for Minor Construction Activities is intended for minor construction activities (installation of toilets, benches etc.) in a Blue Action Fund Project. For more comprehensive construction activities (e.g. ranger office, pier etc.) please refer to Annex G (ESMP – Small Construction).

This document must be reviewed if the scope of work or nature of site hazards changes and updated as warranted.

All on-site personnel must be appropriately trained and qualified for the planned scope of work to be performed.

Project name			
Site location / address			
Works to be implemented by (e.g. company, person)			
Describe the scope of work (e.g. installation of toilets, shelter, benches etc.)			
Person in charge at construction location		Phone / contact details	
Expected start date		Expected end date	

Need for Personal Protective Equipment? No <input type="checkbox"/> Yes <input type="checkbox"/> <i>(if yes, tick applicable boxes on the right)</i>	Personal Protective Equipment:		
	<input type="checkbox"/> Safety shoes	<input type="checkbox"/> Hard hat	<input type="checkbox"/> Safety glasses
	<input type="checkbox"/> Hearing protection	<input type="checkbox"/> High visibility vest	<input type="checkbox"/> Long sleeve shirt & long pants
	<input type="checkbox"/> Respiratory protection	<input type="checkbox"/> Other (specify):	

Anticipated activities	Mitigation Measures
<input type="checkbox"/> Working on water bodies	<ul style="list-style-type: none"> • Wear suitable footwear for shore areas (waders / rubber boots) • Prior to wading through the water, the depth and condition of the body of water must be checked • Keep away from water in severe weather (lightning) • Use a life jacket for working on water depth of more than 40 cm. • Always work in pairs, with one person not in the water.



Health and Safety Plan

<input type="checkbox"/> Lifting / carrying heavy loads	<ul style="list-style-type: none"> • Use of suitable carrying aids (e.g. crane, trolleys) • Get help if odd shaped objects or heavy objects of more than 15kg have to be lifted • Ensure that the transport containers are not too full / heavily loaded • Bend and lift from the arms / legs, not from the back • If possible, use electrically operated tools instead of manual tools • As far as possible, ensure regular changes of activity or movement. • Wear gloves
<input type="checkbox"/> Work in areas with danger of falling (e.g. roofs, ladders, ditches)	<ul style="list-style-type: none"> • When ascending / descending ladders, contact the ladder at three points at all times • Use approved and tested ladders in accordance with CE standards • Ensure that steps, ladder rungs and shoes are not slippery • Do not work on the top rungs of the ladder • Make sure, that the ladder extends at least 1 m above the upper bearing point • If necessary, a second person must hold the ladder down. Alternatively, secure the top edge of the ladder. • Ensure that the ladder is secure. • Do not come closer than 2 m to the unsecured roof edge and crest edges. • If the stability of a roof is unclear - never step on it!
<input type="checkbox"/> Others:	<p><i>Prepare Risk Assessment</i></p>

