

Simplified Approval Process

Annex 12: Environmental and social action plan



Summary of risks	Mitigation measures	Risk significance	Responsible party/person	Schedule	Expected results	Cost/Budget
<i>This contains the description of risks and can be derived from the responses to the screening questions in Part B2.</i>	<i>Options to avoid, reduce, mitigate risks and impacts. This may also indicate additional due diligence and specific management plans</i>	<i>This contains a description of the overall level of risk*</i>	<i>Individual person, unit, or entity tasked to carry out the mitigation measures</i>	<i>Timing of implementation of measures including any additional due diligence and management plans and may depend on the stage of implementation</i>	<i>Expected outputs of the measures</i>	<i>Estimated cost of carrying out the measures</i>
Social impacts: Land tenure	The project does not include any activities involving resettlement or land acquisition. All restoration and reforestation activities will take place on land where the tenure situation is clear and non-conflictual. This will be facilitated by the planned geo-referencing of all the project's restoration and reforestation activities. During the initial phase of project implementation in any given Locality, extensive stakeholder consultations will be conducted among farming and pastoralist communities to ensure that all stakeholders	Low	FNC (for gum agroforestry systems and reforestation) Range and Pasture Administration/NGO facilitator (for livestock corridors and rangeland restoration) FAO (as part of AE supervision role)	Throughout the duration of the project	No tenure conflicts are expected to occur as all restoration and reforestation activities will take place on land where the tenure situation is clear and non-conflictual. Project staff at Locality and State level will be required to report any land tenure conflicts related to project activities, including if and how they resolved them, on a quarterly basis.	Planning cost will be an integral part of the standard community and site assessment and selection process. Estimated cost USD 20,000 Geo-referencing cost is part of FNC's in-kind contribution to the project (staff secondment and use of equipment and software obtained under FAO-supported REDD+ project). Implementation cost will be covered as part of standard FNC, NGO and FAO supervision procedures.

	have a voice in the exact location and modus operandi of the project's planned activities. These stakeholder consultations will be informed and guided by the FAO's Voluntary Guidelines on the Responsible Governance of Tenure of land, fisheries and forestry in the context of national food security . ¹					Estimated cost USD 40,000
Social Impacts: natural resource use	The project will implement income-generating and ecosystem restoration activities with local communities. Some restoration activities may require temporary exclusion of livestock. Prior to any restoration activity, NGOs contracted by FAO will facilitate dialogue between farmers and agro-pastoralists to agree on land use plans and management rules. Any (temporary) restrictions on land and resource use to enhance ecosystem restoration will be "self-imposed", i.e. they will be	Low	FNC (gum agroforestry systems and reforestation) Range and Pasture Administration/ NGO facilitators (livestock corridors and rangeland restoration) FAO (as part of AE supervision role)	Throughout the duration of the project	All local agreements re (temporary) restrictions on land use (e.g. pasture, extractive activities) will be documented and any related conflicts recorded and monitored, including if and how they were resolved, on a quarterly basis. NGOs contracted to facilitate local agreements under the project will be	Planning cost will be integral part of local stakeholder negotiations facilitated by the project prior to any implementation activity. Estimated cost USD 20,000 Geo-referencing cost is part of FNC's in-kind contribution to the project (staff secondment and use of equipment and software obtained under FAO-supported REDD+ project).

¹ <http://www.fao.org/tenure/voluntary-guidelines/en/>

	agreed by the community prior to their implementation. Planned geo-referencing of all land restoration and reforestation activities will further help to prevent conflict.				required to put in place a simple grievance redress mechanism to deal with unresolved conflicts and pay special attention to any vulnerable groups in the process	Implementation cost will be covered as part of standard FNC, NGO and FAO planning and supervision procedures. Estimated cost USD 40,000
Social Impacts: Gender	Gender inequality is considerable in Sudan, and the project includes specific measures (such as supporting women-only gum producer groups) to ensure that women can benefit equitably from the activities funded. Dialogue with local stakeholders (both men and women) will be conducted to avoid any negative local backlash that might result from an improvement in women's economic position.	Low	FNC (gum agroforestry systems and reforestation) Range and Pasture Administration / NGO facilitator (livestock corridors and rangeland restoration) FAO (as part of AE supervision role)	Throughout the duration of the project	Community dialogue re gender; other gender conflict risk mitigation measures to be developed and implemented as needed (see also Gender Action Plan). NGO facilitators and Project staff at Locality and State level will be required to report any major gender conflicts related to project activities, including if and how they were resolved, on a quarterly basis, and to disclose to local	Implementation cost will be covered under the Gender Action Plan (total cost 289,650 USD, see Annex 4)) In addition, gender issues will also be part of standard FNC, NGO and FAO planning and supervision procedures.

					communities on a regular basis how grievances were addressed.	
Social Impacts: Cultural Heritage	The project will not affect any cultural heritage sites and properties. If there are any such sites near a project implementation area, continuous access to the cultural sites will be guaranteed	Zero	FNC (gum agroforestry systems and reforestation) Range and Pasture Administration / NGO facilitator (livestock corridors and rangeland restoration) FAO (as part of AE supervision role)	Throughout the duration of the project		Implementation cost will be covered as part of standard FNC, NGO and FAO planning and supervision procedures. Estimated cost USD 10,000
Environmental impact: Biodiversity	No plantations will be established in protected areas or other areas of ecological significance. The project will support small-scale plantations in agro-forestry configurations on existing farmland. In addition, some gum plantations will be established in highly degraded government production forests, under co-management agreements with local communities. These production forests are not considered to be protected areas (<i>sensu</i> IUCN) under Sudanese	Low	FNC (gum agroforestry systems and reforestation) Range and Pasture Administration / NGO facilitator (livestock corridors and rangeland restoration) FAO (as part of AE supervision role)	Throughout the duration of the project	FNC screening reports re fragile sites to be excluded from reforestation activities	Implementation cost will be covered as part of standard FNC, NGO and FAO planning and supervision procedures. Estimated cost USD 15,000

	law. FNC's experience in working with local communities in Sudan to restore degraded production forest reserves and share the proceeds of the gum and other forest products with them is positive and has led to enhancement of soil and water conservation and biodiversity values in these degraded government forests.					
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NB. This annex only addresses the risks of negative impacts that could potentially materialize – many potential risks are certain not to occur (e.g. the project does not employ workers and does not use exotic species or pesticides; there are no indigenous peoples in the project area), as ascertained in the Environmental and Social Safeguards appendix to the Sudan GAMS SAP Concept Note submitted in early 2019, and further detailed in FAO's response to the questions raised by the ESS experts in the GCF Secretariat (Email from Nadine Valat to Juan Chang, 16 May 2019).

**Risk significance. The probability of occurrence is the likelihood for a risk to occur and can be characterized in terms of the degree to which it will happen (for example, the UNDP screening procedure uses "expected, highly likely, moderately likely, not likely, and slight"). The impact or magnitude of risks is the description of how severe the impacts would be if it were to occur (for example, "critical, severe, moderate, minor, and negligible"). A significance value of the risk (for example low, medium, high) can be obtained by combining the probability and impact values. The risk significance indicates the relationship between probability and severity or magnitude of impacts. The entities or organizations that will be implementing the proposed activities are best positioned to define the probability of occurrence and severity or magnitude of impacts.*

There is no single technique to determine the significance of risks nor will it apply in all situations. The entities and organizations that will be implementing the activities will need to determine which technique will work best for each situation. Determining risk significance would require an understanding of activities and locations, the urgency of situations, and objective judgment.

Appendix a. Grievance redress mechanism

FAO grievance mechanism

The grievance redress mechanism is designed to ensure that no individual or group are financially impacted by making a grievance or complaint. Any cost that may be associated with the preparation or issuance of a legitimate complaint or grievance (e.g. engaging a qualified person to assist the complainant) will be covered by the grievance mechanism. Special efforts will be made to ensure the grievance redress mechanism is available for all people, and that marginalized and vulnerable groups have equal access and bear no negative repercussions for filing any complaints or grievances.

The FAO is committed to ensuring that its programs are implemented in accordance with the organization's environmental and social standards. In order to better achieve these goals, and to ensure that beneficiaries of FAO programs have access to an effective and timely mechanism to address their concerns about non-compliance with these obligations, the organization, in order to supplement measures for receiving, reviewing and acting as appropriate on these concerns at the program management level, has entrusted the Office of the Inspector-General (OIG) with the mandate to independently review the complaints that cannot be resolved at that level.

The FAO will facilitate the resolution of concerns of beneficiaries of FAO programs regarding alleged or potential violations of FAO's social and environmental commitments. For this purpose, concerns may be communicated in accordance with the eligibility criteria of the Guidelines for Compliance Reviews Following Complaints Related to the Organization's Environmental and Social Standards, which applies to all FAO programs and projects (Guidelines for Compliance Reviews Following Complaints Related to the Organization's Environmental and Social Standards).

Concerns must be addressed at the closest appropriate level, i.e. at the project management/technical level, and if necessary at the Regional Office level. If a concern or grievance cannot be resolved through consultations and measures at the project management level, a complaint requesting a Compliance Review may be filed with the OIG in accordance with the Guidelines. Project managers will have the responsibility to address concerns brought to the attention of the focal point.

The principles to be followed during the complaint resolution process include: impartiality, respect for human rights, coherence with national norms, equality, transparency, honesty and mutual respect.

Project-level grievance mechanism

FNC operates a grievance redress mechanism called "complaints mechanism", but there is no formal institutional policy on it. FNC has complaints boxes in their offices, and dedicated phone numbers to receive complaints. All complaints go to the "confidential office" first, which transfers them to the Director General (DG). The DG forms a committee to investigate the case, and actions are taken according to the applicable government rules. In case the complaint is against the DG, it is transferred to the Minister of Agriculture.

The project will build in FNC's existing mechanism, upgrading it by applying FAO's corporate policy vis-à-vis addressing and resolving grievances and by formalizing the mechanism. The grievance mechanism will acknowledge and address any negative impacts of complaints that arise as a result of the project. Any grievances should be analyzed and mitigated as quickly as possible to avoid any

tensions or conflicts. The grievance mechanism proposed here is cost effective as it will be integrated into the institutional mechanism of the FNC, which is the national EE for the project.

The objectives of the grievance redress mechanism are to:

- Provide affected people an avenue through which they can voice their grievances;
- Create a platform in which stakeholders and community members can freely raise concerns and complaints to be effectively addressed;
- Demonstrate to project stakeholders and communities that they play an important role in project design and implementation;
- Follow up and report on efforts to take corrective action.

As the grievance mechanism is instated in order to provide a platform for concerns to be voiced by any party, it is important that the method in which grievances can be made is effectively distributed to all stakeholders and community members within the project area. Information regarding the grievance redress mechanism will be distributed to all relevant stakeholders and affected communities through:

- Stakeholder meetings that are held at the start of the project for selection of specific beneficiaries (smallholder gum Arabic producer groups, local communities interested in reforestation of degraded lands, farming and herding communities around livestock routes) and for receiving inputs on and feedback regarding proposed project activities under the different outputs. Most of these meetings will be held at Locality and Village Cluster level, thus guaranteeing the presence of the project beneficiaries.
- Brochures regarding GAMS grievance redress mechanism (produced in Arabic) mentioning channels for expressing grievances (complaints box, dedicated confidential telephone numbers), distributed to diverse stakeholders including State and Locality level
- FAO Sudan webpage
- Included as part of any other communication material that is designed and distributed during project implementation
- Regular dissemination of reports on grievances received and how they were resolved

Specific measures should be taken to facilitate the reporting of grievances by women, who may face higher barriers to doing so. Since there may be cultural constraints on women reporting grievances to men, the FNC confidential officer should be either a woman, or if it is a man, he should have a female colleague with a dedicated phone number for women to report their grievances.

Grievance redress procedure

The grievance redress procedure has five steps:

1. Receive and register

- Community organizations, households' individuals or other stakeholders submit their grievances to the established FNC channels (complaints box and dedicated confidential phone numbers)
- FNC confidential officer will receive grievances or feedback through the channels mentioned above

2. Acknowledge, screen, assess and assign

- FNC confidential officer will screen each grievance to ensure eligibility and either will assign staff to assess and investigate the grievance or forward the grievance to the FNC DG if necessary

3. Respond and address

- FNC confidential officer proposes options to address the grievance to the complainant and any other related parties to reach an agreement.

4. Implement and monitor

- FNC confidential officer requests to implement the agreed upon redress option and, along with input from other FNC or PMU officers, assigns a relevant officer to monitor the progress and effectiveness of implementation.

5. Report

- FNC confidential officer prepares a report, based on a standardized template, on the status of all grievances. This report is then submitted to the Project Coordinator, for monitoring purposes.
- The report will be made available on the official website for public access.

For all grievances, the rule is that they should be addressed at the lowest appropriate level, in the case of GAMS the project team at Locality level. This will build the capacity of local stakeholders and FNC staff to resolve conflicts in a constructive manner. Grievances that cannot be remedied at local level should of course be referred to higher level, initially the State-level project team and if necessary, FNC HQ.

Appendix b. Stakeholder engagement plan

The GAMS project has many different stakeholders: smallholder gum producer groups (GAPAs) interested in the gum value chain activities and agroforestry restoration; local communities interested in reforestation of degraded land and restoration of rangelands; gum companies seeking to get more reliable supplies of better quality gum, microfinance institutions wanting to work more with smallholder farmers, including women, to grow their financial services portfolios; government agencies (especially at State and Locality Level) willing to engage in improved land use regulation and coordination across land use sectors.

Since January 2017, FNC and FAO have engaged stakeholders in project preparation in a number of ways: (i) January 2017 multi-stakeholder workshop to discuss scope of project²; (ii) July 2017 workshop with government and non-government stakeholders from all the 13 gum belt states, to agree on criteria for selecting the project area, focusing on climate change considerations and environmental and socio-economic co-benefits³; (iii) September 2017 – September 2018 FNC/FAO field visits and stakeholder discussions in seven gum belt States, including North, South and West Kordofan; (iv) November 2017 – September 2018 FNC participatory assessment of the capacity of smallholder gum producer groups (GAPAs) to engage in the project; (v) January 2018 multi-stakeholder workshop to discuss initial findings of project preparation team; (vi) May 2018 workshop to consult with private sector gum buyers and micro-finance institutions; (vii) September 2018 project preparation team meetings with local stakeholders in North Kordofan. A final validation workshop will be organized after GCF feedback on the proposal has been received.

All throughout these stakeholder interactions, special attention has been paid to the engagement of female stakeholders, including discussions with female beneficiaries of the AFD funded pilot gum project that GAMS aims to scale up. This has led to the identification of a number of remedial measures to ensure women will benefit equitably from the GAMS project, which are summarized in Annex 4, Gender Assessment and Action Plan.

Most of the GAMS project activities are about stakeholder engagement: supporting farming communities with agroforestry and gum value chain activities, and developing Village Cluster Level Adaptation Plans with them; facilitating contract farming arrangements between smallholder farmer producer groups and gum exporting companies; engaging with microfinance institutions to develop financial services that are more attractive to smallholder farmers.

To implement these activities, the project will organize more than 500 consultation, participatory planning and brokering meetings, which are described in detail under the Activity descriptions in the Funded Activity Agreement Annex 1 provided.

In addition to these stakeholder engagement activities with project beneficiaries, the project will also engage with the following stakeholders:

- Gum Arabic exporting companies, in order to recruit additional companies to work with smallholder gum producer groups (GAPAs) supported by the GAMS project. The companies that showed an interest in the GAMS approach during the project preparation phase will be specifically targeted in this regard;

² Scoping workshop recommendations and participant's list are available in project files.

³ Workshop participants' list and site selection report are available in project files.

- Microfinance Institutions, in order to recruit additional financial service providers willing to develop innovative financial products tailored for smallholder producers;
- Gum Arabic Board, re the implementation of the new National Gum Arabic Sector Strategy, and specifically, the adoption of the AIPG gum standard for “clean, dry hashab gum Arabic” that will enable smallholder gum producer associations supported by the project to sell their gum directly in auction markets at premium prices;
- National and local civil society actors that may not be directly involved in project implementation, but that have experience to contribute that can benefit the GAMS project;
- Other financial and technical partners of the Sudanese government, especially those involved in implementing GCF-funded projects such as UNDP and UNEP, and those involved in supporting Natural Resource Management and Climate Change interventions, such as IFAD and the World Bank. With these stakeholders, the GAMS project will share lessons learned from experience and request input on a “best practice” publication that will be used to scale up the GAMS project to other Sahelian countries, as intended under GCF’s Great Green Wall umbrella programme