

# Simplified Approval Process

## Annex 12: Environmental and social action plan



## **1. Rationale for the environmental and social risk category provided for the project**

As stated in round 1, the Project has been categorized as low risk (category C) because project activities are of minimal to low adverse social and environmental risks and impacts. Many of the activities are related to capacity building and have no physical elements, while other activities, mainly those directly related to DAS implementation, are of small-scale, do not involve any sort of people displacement or adverse impact on indigenous people. It is worth highlighting that:

- There will be no new built environment or infrastructure, besides small-scale nurseries.
- Agroforestry practices promoted will be those already under implementation in the territory, with no new elements to what is already led by community members themselves. In fact, the project aims to scale existing practices to enhance climate resilience.
- The project does not involve physical and/ or economic displacement of people.
- Many of the project activities have a focus on capacity building, institutional development, advisory services, knowledge management and communication.

## **2. Included and excluded activities**

Only small-scale agroforestry activities will be financed by the project. Specifically regarding the Reserve Fund for Community Access to Credit, it will include only small-scale PRONAF credit lines for sociobiodiversity value chains provided for in the agreement between Conexsus and BASA. For this reason, activities such as cattle farming, swine farming, poultry farming, aquaculture and shrimp farming are excluded.

## **3. SEAH Safeguarding**

Fundación Avina has an institutional policy framework with the principle of zero tolerance to gender-based violence or harassment. For this reason the measures are for prevention, management and transformation of conflicts. Thus, the project will carry out:

a) Prevention: in addition to having a full-time gender specialist, there will be training for the team and implementing partner organizations, as well as for the different actors that are part of the project. Policies will be disseminated and care will be taken to promote and disseminate Fundación Avina's complaints mechanism for any case involving violence, harassment or discrimination based on gender or other criteria. The team involved will also have to sign the code of ethics and code of behavior for spaces free of harassment and violence that will be endorsed periodically.

As preventive measures, we will also work on program planning with a cross-cutting and gender-responsive approach, identifying possible risks or types of conflicts associated with the imbalance of financial, political or community power. We have shown that the impact of the project can directly affect the relationships in the community, in the producer associations and especially in the women within their family environment, for this reason we will accompany the financial empowerment and access to resources and knowledge with permanent listening, consultation and attention to possible cases of harassment or violence that women may suffer due to the change of improvements in their self-esteem, leadership, financial and organizational capacity.

Fundación Avina has experience in identifying in advance, through the programmatic team, cases of early warning of risks, including those associated with insecurity and gender violence. In these cases we do not necessarily expect a complaint or formalization of the case by the victim, but also the team in the territory can alert and consult with the Gender Committee or the Risk Committee of Fundación Avina to help prevent and generate security actions and support to possible cases of any type of violence to vulnerable groups that are associated with the project.

b) Management: Risk management is through the Grievance Mechanism, and also accompanies cases of risk due to violence and/or gender-based insecurity. There is a working model with a sensitive approach to the care of victims who can access the team's consultations from any platform: web form, email, phone call, interview with someone related to the project, etc. Once a case is submitted, it is evaluated within the grievance mechanism and linked to the Gender and Diversity Committee of Fundación Avina.

The management process involves: a) the receipt of the complaint or demand of the case, b) an analysis of the grievance mechanism in association with the Gender and Diversity Committee of Fundación Avina that defines the eligibility, c) in case of acceptance, the action plan and timelines are proposed, d) the implementation of the plan and finally the conclusion of the process.

If necessary, specialist assistance will be provided to accompany the victim, and there will also be a budget to seek support from organisations specialised in complex cases, in addition to generating all actions to ensure a serious, transparent and conducive process to generate restorative justice. The victim and his or her companions will have detailed information on the process and at the project level the report to the GCF will be complied with, taking care of confidentiality measures.

In case a crime has been committed and the victim agrees to pursue a legal process, all conditions will be created to support and provide legal advice when making a report to the police.

Finally, a Gender Situation Room in the Local advisory Committee will monitor gender issues during implementation, including those related to SEAH.

On the other hand, assessment of SEAH risks will be regularly done by all EEs throughout project implementation, and also in consultations with LAC in the gender and quilombola rooms. Once new risks are identified or status of risks change, this will be incorporated into the ESAP and discussed in regular ESAP monitoring meetings.

Summary of risks	Mitigation measures	Risk significance	Responsible party/person <sup>1</sup>	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>
Disposal of equipment's bought or facilitated by the project, such as batteries and other components of solar panels, are not well managed and expose the community and environment to harmful substances.	<p>Special care will be taken through the prioritization of suppliers that promote the circular economy. In the case of waste from the solar energy component, it is contemplated that the service providers of the facilities will also have a recycling, reuse or final disposal service for the materials used.</p> <p>On the other hand, information about maintenance and best practices in disposal of components of solar panels, including batteries, will be included in the capacity</p>	Low	AE and Belterra as EE of activity 1.2.1	<p>At procurement stage of hiring services and products, in special solar panels.</p> <p>At stage of capacity building of smallholders (activity 1.1.2)</p> <p>At stage of delivery of equipments to smallholders</p>	<p>100% of smallholders that receive solar panels count with relevant information for responsible disposal.</p> <p>Local authorities trained on waste management of batteries and other components of solar panels.</p>	Included in activity 1.1.2 and 2.1.1.

<sup>1</sup> During implementation stage, a group composed of representatives from all three EEs, as well as the gender and diversity consultant, will meet regularly to monitor and update the ESAP.

	building program to smallholders (activity 1.1.2) and to local authorities (activity 2.1.1)					
Equipment's in the supply chain of solar panels bought or facilitated by the project are linked to forced labour and/or irregular working conditions.	Inclusion of requirements and standards for the contracting of goods and services in the solar panel chain.	Low	AE	At procurement stage, when selecting providers.	100% of contracts and services have been evaluated and all required compliance has been attended.	None
Overuse of chemical weeding or pest control substances	<p>Products for chemical weeding or pest control will be provided only if necessary and with the objective of minimizing their use.</p> <p>Information on the need to minimize use is provided to smallholders</p>	Low	AE and Belterra as EE in Activity 1.2.5	<p>At stage of capacity building of smallholders (activity 1.1.2)</p> <p>At stage of providing materials to beneficiaries (activity 1.2.5)</p>	<p>100% of smallholders that implement DAS count with relevant information on the need to minimize use of chemical weeding or pest control.</p> <p>Minimization of provision of chemical weeding or pest control products</p>	Included in activity 1.1.2 and 1.2.5.
While the project aims to enhance resilience in face of extreme weather events, there is a risk that heavy rains and sea level rise	Activate the Local Advisory Committee to assess the situation and articulate rapid responses.	Low	AE	Right after the event takes place	80% of risk situations related to extreme events were assessed to mitigate impacts	The contingency fee could be needed depending on the type of losses and damages generated, the level of impact

(lancantes) affect communities at early stage of the project, generating losses and damages before DAS are in place /disseminated.					on production and livelihoods.	on project activities and the stage of project development.
Given that subsistence agriculture and domestic work are in the hands of women and the project focuses on them, there is a risk of generating an additional overload of tasks and work for women.	The gender plan foresees measures to diminish this risk. A Gender Situation Room will monitor gender-related issues during the project.	Low	Gender consultant and AE	In planning and implementation stages.	Gender outcome indicators are met, reflecting women's interest and capacity. There is no risk of overburdening women.	Included in budget for gender consultant
As the project intends to shift power towards women, this may lead to possible increase in expressions of gender-based violence and harassment. This may be related to the empowerment of women in the financial, political and organizational spheres that the project will promote.	<p>Clear protocols to be followed in case there is any indication of problems with beneficiaries.</p> <p>Training of the implementation team and key actors to provide early warning of any type of violence.</p> <p>The team involved will have to sign the code of ethics and code of behavior for spaces free of harassment and violence that will be endorsed periodically.</p> <p>Continuous accompaniment of the</p>	Low	AE	In planning and implementation stages.	100% of security cases attended and managed.	Contemplated in the budget and reinforced with the contingency budget.

	<p>team in case of possible harassment and violence, coordination with authorities or institutions working in the field. Contingency funds will be used for emergencies regarding SEAH.<sup>2</sup></p> <p>Gender Situation Room in the Local Advisory Committee, where these issues will be yearly monitored and evaluated, for the continuous improvement of related project' strategies.<sup>3</sup></p>					
--	---	--	--	--	--	--

<sup>2</sup> To measure the actual occurrence of any unforeseen emerging event that may require approval to allocate contingency funds, we will need first to gather all the necessary information from internal and external sources. This action may take the first weeks after the situation is identified. In all cases, detailed notes of what happened will be taken, and records of any written or electronic communication will be collected. The person or group of persons affected will be required to provide evidence that proves the occurrence of the event such as: emails, photos, screenshots, video documentation of threatening messages, harassing social media posts, unwanted repeated phone calls, among other behaviors from harasser, abuser, perpetrator, or any violent party. In case that evidence is not what expected, we will not reject the case immediately; we commit ourselves to investigate thoroughly to obtain as much information as possible. A timeline of events will be recreated to demonstrate how the event occurred and the level of the damage caused. A list of people involved, not only the victims (if many) but witnesses or any other person that may be aware of the situation, will also be prepared. Staff from Fundación Avina may be required to travel to collect information in site; if so, travel expenses reports will be presented along with the in-site travel report. If any technical, expert, or legal support is required, professional services proposals will be requested (fees included) and specialized reports will be provided for such supports. Expenses related to hire these services may be requested in advance to GCF and included in the financial reports to be later submitted. All these inputs, supporting documentation, and assessment performed by Fundación Avina will be consolidated and presented to Green Climate Fund along with a systematization of the case including lessons learned and processes implemented to avoid similar future occurrences. Timing for submitting all these data may vary according to the nature of the reported event, financing needs, confidentiality matter, and/or requirements from GCF.

<sup>3</sup> The ESAP, including SEAH safeguarding, is understood as a shared responsibility between all executing entities. During implementation stage, a group composed of representatives from all three EEs, as well as the gender and diversity consultant, will meet regularly to monitor and update the ESAP. Furthermore, it is to be noted that EEs will be subject not only to policies at established by their organizations but also to Fundación Avina's own guidelines and policies. This is a commitment they assume at the time of formalizing the cooperation agreement with Fundación Avina, which includes SEAH related issues. Besides this, there will be training on SEAH issues for the entire project team, including staff from EE Belterra and Conexsus and other implementing partner s, including key service providers and other organizations. Furthermore, EE's teams involved will have to sign the code of ethics and code of behavior for spaces free of harassment and violence that will be endorsed periodically.

<p>The project will be implemented in the Marajó Archipelago Environmental Protection Area where human activities should be limited to reduce ecological damage. In addition, there is potentially one RAMSAR site, Amazon Estuary and its Mangroves, in the project location and areas within the project sites that may overlap with areas of ecological importance in the country.</p>	<p>The Brazilian Law defines two types of Conservation Units (i) Integral Protection and (ii) Sustainable use. The Marajó Environmental Protected Area (APA Marajó) fits in this last category, meaning that economic activities (ex: agriculture) are allowed within the area, provided that they follow specific guidelines from the environmental agencies. The project will include both ICMBio (federal environmental entity) and IDEFLOR-Bio (state environmental entity) as members of the Local Advisory Committee to ensure compliance with the law and with the APA Marajó guidelines.</p> <p>The project will not work within the borders of any Conservation Unit of Integral Protection. Furthermore, the team of Belterra, the executing entity for DAS implementation, has experience in working with agroforestry in APAs and counts with competent professionals to identify risks and</p>	Low	AE	In planning and implementation stages.	The project will not work within the borders of any Conservation Unit of Integral Protection	None
---	---	-----	----	--	--	------



	impacts in protected areas.					
Introduction of invasive species	The seeds used in the project will be certified by relevant local authorities or registered through RENASEM (Registro Nacional de Sementes e Mudás)	Low	AE and Belterra as EE of activity 1.2.5	In implementation stage	100% of seeds certified by relevant local authorities or registered through RENASEM (Registro Nacional de Sementes e Mudás)	None
Agroforest to produce commodity crops such as açai might motivate farmers to convert areas of swam savannahs (campo alagado) into agroforest fields. Such conversion might impact by reducing the diversity of grasses, shrubs and other species adapted to savannahs environments	The project will implement diversified systems with at least 17 locally adapted species (not only commodity crops), including species for the ecological recuperation of riparian vegetation. Belterra (EE) has a constant monitoring through PRODES (Projeto de Monitoramento do Desmatamento na Amazônia Legal por Satélite. In eventual cases, Belterra will support the Programa de Regularização Ambiental (PRA) for restoration.	Low	AE and Belterra as EE of activity 1.2.5	In planning and implementation stages.	Higher diversity of species	None
The expansion of Agroforest might affect the resting and reproductive grounds	The project will implement diversified systems with at least 17 locally adapted species	Low	AE and Belterra as EE of activity 1.2.5	In planning and implementation stages.	Higher diversity of species	None

of residents and migratory fish due to the conversion of the flooded forests (riparian vegetation) into agroforest fields.	(not only commodity crops), including species for the ecological recuperation of riparian vegetation. Belterra (EE) has a constant monitoring through PRODES (Projeto de Monitoramento do Desmatamento na Amazônia Legal por Satélite. In eventual cases, Belterra will support the Programa de Regularização Ambiental (PRA) for restoration.					
The project may further foster the trend of monetization of relations, where the traditional “mutirão” (collective work) is being substituted by daily fees for people to work in the farms.	The project will not pay daily fees for people to work in farms. Instead, it will promote a Results Based Payment Scheme, where 54% of the reward is in kind, 22% in technical assistance and 24% is cash, but based on results and in paid only in specific moments of great achievements.	Low	AE	In planning and implementation stages.	Traditional collective work maintained	None

*\*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.*