

Simplified Approval Process

Annex 12: Environmental and social action plan

Climate Adaptation, Resilience and Engagement in Local Government (CARE-LG)

Bhutan Trust Fund for Environmental Conservation

Bhutan



Introduction

The proposed project will award CCA grants to eligible Gewogs through a detailed guideline covering the call for Gewog adaptation plans, screening of investment proposals, defining eligible investments menu, including alignment with the ESS category C and exclusion list, monitoring and evaluation and execution of PBG for adaptation interventions. The grant facility will cover at least 60 Gewogs with the investment grant package of up to USD 125,000 per Gewog, which will be provided based on a set of eligibility and selection criteria. Indicative selection and eligibility criteria includes: (a) a Gewog should be among the 120 most vulnerable Gewogs identified in the Climate Vulnerability Risk Assessment Report (NAP 2023); (b) proposed adaptation investments should meet requirements of Eligibility for PBGM Allocation detailed out in the Framework Guidelines for CARE-LG Performance-Based Climate Resilience Grant Mechanism (Appendix 4 of Annex 2)) as well the Investment Menu in the same document; (c) proposed adaptation investments should be aligned with the GCF policies and requirements for the ESS category C and Exclusion List (each adaptation plan to be pre-screened by the ESS specialists at BTFEC and only the investments aligned with the ESS category C and Exclusion list to be submitted for the review of the Project Screening Committee); and d) proposed adaptation investment cost of the Gewog should not exceed USD 125,000.

The adaptation grant proposals that pass the pre-screening for eligibility criteria will be evaluated by the Screening Committee, which will ensure that the grant proposals meet the following indicative set of selection criteria: (a) community proposals to be prepared through stakeholders' consultations, demonstrated through evidence that the Gewog Assembly meetings were held and proposals are prepared with participation of at least 50% percent of *Chiwog* population as verified by the minutes of meeting with list of participants attached; (b) strong climate rationale (based on reliable climate studies) and proposed adaptation (and mitigation) investment; (c) share of Chiwog population benefitting from adaptation interventions to be at least 50% of total population; and, (d) strong sustainability aspect demonstrated with arrangements for provision of adequate management, operation and maintenance. The PSC will additionally screen each grant proposal for the alignment with requirements for ESS category C and Exclusion List.

The ESAP of the project comprises of the following:

- **Part A:** ESAP including action plan covering GCF standards and SEAH and Implementation and M&E for ESAP/SEAH
- **Part B:** Gewog Adaptation Plan – ESS Screening and Categorization that includes i. summary information on the proposed Gewog Adaptation Plan; ii. Risk Factors, iii. Specific environmental and social risks and impacts; iv. SEAH risks and v. Categorization Implementation and M&E for ESAP/SEAH
- ESS Screening and Categorization and Implementation and M&E for ESAP/SEAH, Categorization and Sign Off
- **Part C:** Exclusion List that considers excluding any activity which will potentially involve moderate to high environmental and social risks and impacts (category B and A)

Part A: ESAP

This section presents the ESAP template at program level. Investment specific ESAP will be prepared if needed during the project implementation. In addition to the ESAP template for SAP, the ESAP also includes actions related to SEAH and Implementation and M&E for ESAP/SEAH as follows:

Summary of risks	Mitigation measures	Risk significance	Responsible party/person	Schedule	Expected results	Cost/Budget (USD)
Assessment and Management of Environmental and Social Risks and Impacts						
Proposals for PBGM financing may be beyond environmental and social category C	<ul style="list-style-type: none"> • PBGM guidance and template to be applied. • Exclusion list to be applied to all proposals submitted for PBGM financing 	Not Likely	PMU DPBP DLGDM BT FEC	During call of BPGM proposals in year 1 and during assessment of Gewog Adaptation Plans for PBGM financing	All proposals considered for PBGM financing are within environmental and social category C	Budgeted in project activity no. 1.3.4
Labour and Working Conditions						
Health and safety of workers may be compromised (activity 2.1.1; 2.2.1; 2.2.2)	<ul style="list-style-type: none"> • Contractual arrangement with contractors to include clauses as per occupational health and safety provisions on: <ul style="list-style-type: none"> - Equal pay for equal work hours to workers in the project activities - Occupational health and safety provisions in the budget for contract bidding. - Proper establishment of amenities in temporary worker camps and provide proper working conditions as per labour regulations, - Worker data to be maintained at site with age and identify cards. 	Not Likely	<p>Gewog office on contract clauses</p> <p>PMU and BT FEC on compliance monitoring and reporting</p> <p>Department of Labour (regular monitoring)</p>	Year 2 onwards (during the implementation of PBGM activities)	<ul style="list-style-type: none"> - Health and safety of workers not compromised. - Contractors and workers at site aware of occupational health and safety provisions and standards. - PPE Issuance Register maintained at sites. 	82,952 (1% of PBGM component to be financed by BT FEC from AF fees)

	<ul style="list-style-type: none"> - Verify labourers' age by checking their identity cards and date of birth prior to their engagement in the project. • Safety measures are implemented while implementing work and PPE and safety gears are provided and used by workers at project site. • Maintain PPE Issuance Register at sites. • Provide first aid kits for minor treatment at site throughout the construction phase. • Check salary disbursement sheets for salary amount paid. • Interview labourers to verify labour wage amount received. • Maintain Grievance Register for proper documentation of the grievance lodged and resolution dispensed. • Awareness to be conducted by local administration to contractors and local employee on labour regulations and standards. These 				<ul style="list-style-type: none"> - Worker data maintained at site with age and identification. - Salary disbursement sheets show equal pay for equal work. 	
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	conditions are regularly monitored by the department of Labour.					
Resource Efficiency and Pollution Prevention						
Risks related to the generation of emissions to air; discharges to water; activity-related greenhouse gas; wastes are not foreseen as the PBGM activities related climate proofing on existing community infrastructure or for climate resilient agriculture practices or for enhancing ecosystem services. Negligible noise may be generated from climate-smart retrofitting activities.	The timing and extent of these activities will be determined by the affected communities to ensure no disturbances occur	Not Likely	Gewog office	Year 2 onwards (during the implementation of PBGM activities)	Minor noise generated from project activities do not disturb local communities of wildlife	0 (no cost foreseen)
Community Health, Safety, and Security						
Through augmentation and climate proofing of existing community assets, the project will enhance health and safety of the affected communities. Hence no risk foreseen	None	NA	NA	NA	NA	NA
Land Acquisition and Involuntary Resettlement						
Project activities will pertain to existing community assets or	Any siting of project activities in government or community lands will be initiated only upon prior informed	Not Likely	Gewog office	Year 1 onwards (during the preparation of	project activities do not involve resettlement and	No cost foreseen

ecosystem services and agriculture areas associated with these existing assets. As a project of ESS category C, CARE-LG will not involve resettlement and dispossession, land acquisition, and economic displacement of persons and communities. Small-scale water storage for drinking or irrigation use will be on community lands which are free from any incumbrances and will not acquire any land	consent and clearances from the concerned stakeholders			Gewog Adaptation Plans for PBGM financing)	dispossession, land acquisition, and economic displacement of persons and communities	
Biodiversity Conservation and Sustainable Management of Living Natural Resources						
The project will help improve capacity of communities in management of natural resources and reduce negative impacts. Activities to enhance ecosystem services will use local or existing species of flora including for small scale plantations. No risk but benefits in terms of enhanced biodiversity conservation and sustainable	NA	NA	NA	NA	NA	0

management of living natural resources						
Indigenous Peoples						
There are no indigenous people in Bhutan. However, the population of Bhutan comprises of ethnic communities that have cultural variations but are integrated and the major ethnic groups themselves are not necessarily distinct or exclusive. As the project activities will have no or minimal risk to ethnic community at local level, an explicit indigenous people's plan is not required.	<ul style="list-style-type: none"> Principles for FPIC will be demonstrated through the project's participatory approach and require that any siting of project activities in government or community lands will be initiated only upon free and prior informed consent and clearances from the concerned stakeholders. Ensure that free and prior informed consent/consideration are taken into account for project developmental activities to ascertain minimal negative impacts to the ethnic community. The screening of Gewog adaptation plans for PBG financing to assess inclusion of free and prior informed consents for siting of project activities 	Not Likely	<ul style="list-style-type: none"> Gewog office for participatory process of Gewog adaptation plan preparation. Screening Committee to assess participatory process and for inclusion of free and prior informed consent (clearances). 	<ul style="list-style-type: none"> During Gewog adaptation plan preparation. During proposal screening. 	Stakeholder conflicts do not arise from project activities as a result of free and prior informed consent from the stakeholders	Screening is budgeted in project activity no. 1.3.4
Cultural Heritage						
The performance grant for climate resilience for Gewogs will be integral part of mainstream Gewog plan. Hence workers on project activities will be within the Gewog communities who are aware of local	<p>Unintentional and unexpected desecration of local sacred/cultural assets to be managed through a chance find procedure as follows;</p> <p>In case of suspected chance finds, the activity shall immediately stop all works;</p>	Not Likely	<ul style="list-style-type: none"> Gewog office for chance find reporting and stooping work till clearance is availed; 	During implementation of Gewog adaptation plan from year 2 onwards.	No impact on cultural assets	0 (No cost expected from project)

cultural/sacred sites. No cultural risks foreseen. However, unintentional and unexpected cultural assets may be encountered during the project implementation	<p>The Gewog shall report within the same day to the Dzongkhag and Component. Management regarding the suspected chance finds with adequate documentation including photographs of the find;</p> <p>The Dzongkhag and the PMU to report the potential chance finds to the Department of Culture and Dzongkha Development, and the latter to investigate; and</p> <p>No works shall resume until clearance is provided by the DCDD.</p>		<ul style="list-style-type: none"> PMU and Dzongkhag to report to Department of Culture and Dzongkha Development (DCDD). DCDD for investigation and clearance for continuation of further course of action. 			
Stakeholder engagement and grievance						
stakeholders may not be adequately informed about environmental and social consequences of the project implementation and opportunity for feedback may not be availed by stakeholders	<ul style="list-style-type: none"> Implement a Stakeholders Management Plan (available under appendix 5 of Annex 2). Implement a project specific Grievance Redressal Mechanism to accommodate every complaint relating to project activities and implementation including in areas of SEAH, and taking recommended actions on addressing SEAH complaints, if any in timely manner. Develop and implement a local outreach and communication strategy for climate change awareness at local level. 	Not Likely	PMU DPBP DLGDM BTFC	Throughout the project	<ul style="list-style-type: none"> Stakeholders are informed about environmental and social consequences of the project activities. Opportunity for feedback provided 	<p>0 (no additional cost expected)</p> <p>Communication plan strategy is costed in activity 1.1.3)</p>

SEAH						
AE does not have SEAH expert	<p>AE will organize training on SEAH Risk assessment and mitigation for AE officials and EE officials in collaboration with NCWC</p> <p>The training will be conducted by the ESS expert with knowledge on SEAH to deliver the training program</p>	Not likely	AE	Annually	AE and EE has capacity for SEAH assessment	15,000
Awareness on SEAH low at community level	Sensitize community members on SEAH safeguards when conducting awareness on climate change and its risks, stakeholder consultations or trainings on ESS. Including in areas of SEAH as well as during the training of local government official covered under the component of the project	Not likely	PMU	Year one	Enhanced community awareness on SEAH	Covered under project activity 1.1.2
Project workers may be engaged without formal contract	Contract for project work to include clause on requirement for formal written contracts and adherence to local norms and standards for engagement of local worker	Not likely	PMU	throughout project	Contractual arrangement include SEAH considerations	No budget required
Project related recruitment may compromise SEAH principles	Panel interviews shall be mandatory by both national and AE regulations	not likely	PMU	throughout project	Contractual arrangement include SEAH considerations	No budget required
SEAH related awareness materials is not available	Gender-sensitive and culturally appropriate outreach materials will be prepared during implementation as part of awareness and knowledge management	Not likely	PMU	Year one and two	SEAH awareness materials available as part of knowledge product	Budget under activity 1.4.1

Implementation arrangement

The compliance to ESAP will be monitored by various entities at different stages of preparation and implementation. The overall responsibility for implementing the ESAP and for monitoring the compliance of the project's environmental safeguard activities lies with the PMU. The ES Expert appointed by the BTfec shall oversee implementation of ESAP and coordinate with the PMU. The ESAP compliance monitoring will also include grievances that are reported through the Grievance Redress Mechanism (GRM) and on the status of redressal of grievances reported. The grievance data should be analysed and evaluated to make policy and/or process changes to minimize similar grievances in the future.

Implementation and M&E for ESAP/SEAH	Expected Result	Schedule	Responsibility	Cost
Activity 1: Review and revise ESAP/SEAH plan after screening of Gewog Adaptation Plan	ESAP/SEAH plan	Year 1	ESS expert	USD 5,250 budgeted under DAE fee
Activity 2: Monitor, review and report on the compliance on ESAP/SEAH action plan. The ESS monitoring shall also include the implementation of GRM during the project implementation period.	Annual ESAP/SEAH compliance report and recommendation	Year 1,2,3 and 4	ESS expert	USD 21,000 budgeted under DAE fee
Total Budget for ESS/SEAH (inclusive of Health and Safety of Workers (82,852/-) and Training of AE & EE officials on SEAH (15,000/-)				124,202- (Budgeted under DAE fees)

**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.*

Part B: Gewog Adaptation Plan – ESS Screening and Categorization

CARE-LG is SAP project that supports grant proposal that are aligned with the GCF policies and requirements for the ESS category C and associated Exclusion List. The project component two includes awarding grants to Gewog (local) level Climate Adaptation plans submitted by climate change vulnerable Gewogs during the implementation of CARE-LG. The screening forms presented below and the Exclusion List mentioned in Part C will be used for pre-screening and screening stages of each grant proposal. CARE-LG grants for gewog adaptation will be limited to gewog adaptation plans with risk category C, having

minimal to no adverse environmental and social risks/impacts and eliminate any proposal which are categorized as A or B at the pre-screening stage as well as screening stage, as needed.

I: Summary information on the proposed Gewog Adaptation

1	Project Title:	
2	Project Dzongkhag:	
3	Project Gewog:	
4	Chiwog:	
5	Project Period (Start and end year):	
6	Total amount (Nu):	

II: Risk Factors

Please indicate your answers to the questions below and provide an explanation on the response selected. If the criteria is not applicable to the project you may write N/A in the justification box.

Risk Factors of proposed activities	YES	NO
Will the activities involve associated facilities (activities not funded by this project) and require further due diligence of such associated facilities?	<input type="checkbox"/>	<input type="checkbox"/>
Please provide a justification of your answer:		
Will the activities involve trans-boundary impacts including those that would require further due diligence and notification to affected states?	<input type="checkbox"/>	<input type="checkbox"/>
Please provide a justification of your answer:		
Will the activities adversely affect working conditions and health and safety of workers or potentially employ vulnerable categories of workers including women and children?	<input type="checkbox"/>	<input type="checkbox"/>
Please provide a justification of your answer:		
Will the activities potentially generate hazardous waste and pollutants including pesticides and contaminate lands that would require further studies on management, minimization and control and compliance to the country and applicable international environmental quality standards?	<input type="checkbox"/>	<input type="checkbox"/>
Please provide a justification of your answer:		

Will the activities involve the construction, maintenance, and rehabilitation of critical infrastructure (like dams, water impoundments, coastal and river bank infrastructure) that would require further technical assessment and safety studies?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Will the proposed activities potentially involve resettlement and dispossession, land acquisition, and economic displacement of persons and communities?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Will the activities be located in or in the vicinity of protected areas and areas of ecological significance including critical habitats, key biodiversity areas and internationally recognized conservation sites?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Will the activities affect indigenous peoples that would require further due diligence, free, prior and informed consent (FPIC) and documentation of development plans?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Will the activities be located in areas that are considered to have archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values or contains features considered as critical cultural heritage?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		

III: Specific environmental and social risks and impacts

Labour and Working Conditions	YES	NO
Will the activities potentially have impacts on the working conditions, particularly the terms of employment, worker's organization, non-discrimination, equal opportunity, child labour, and forced labour of direct, contracted and third-party workers?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Will the activities pose occupational health and safety risks to workers including supply chain workers?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Resource Efficiency and Pollution Prevention	YES	NO
Will the activities generate (1) emissions to air; (2) discharges to water; (3) activity-related greenhouse gas (GHG) emissions, (4) noise and vibration; and (5) wastes?	<input type="checkbox"/>	<input type="checkbox"/>

<i>Please provide a justification of your answer:</i>		
Will the activities utilize significant amount of natural resources including water and energy?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Will there be a need to develop detailed measures to reduce pollution and promote sustainable use of resources?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Community Health, Safety, and Security	YES	NO
Will the activities potentially generate risks and impacts to the health and safety of the affected communities?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Will there be a need for an emergency preparedness and response plan that also outlines how the affected communities will be assisted in times of emergency?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Will there be risks posed by the security arrangements and potential conflicts at the project site to the workers and affected community?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Land Acquisition and Involuntary Resettlement	YES	NO
Will the activities likely involve land acquisition and/or physical or economic displacement?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Biodiversity Conservation and Sustainable Management of Living Natural Resources	YES	NO
Will the activities potentially introduce invasive alien species of flora and fauna affecting the biodiversity of the area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Will the activities have potential impacts on or be dependent on ecosystem services including production of living natural resources (eg. agriculture, livestock, fisheries, forestry)?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Indigenous Peoples	YES	NO
Will the activities potentially have any indirect impacts on indigenous peoples, ethnic minorities, or vulnerable and marginalized groups?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Cultural Heritage	Yes	NO
Will the activities restrict access to the cultural heritage sites and properties?	<input type="checkbox"/>	<input type="checkbox"/>

<i>Please provide a justification of your answer:</i>		
Will there be a need to prepare a chance-find procedure in case of the discovery of cultural heritage assets?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Stakeholder engagement and grievance	Yes	NO
Will the activities include a continuing stakeholder engagement process and a grievance redress mechanism and integrated into the management/implementation plans?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		

IV: SEAH risks

Based on the GCF SEAH guidance, the following SEAH risk screening will be carried out on each Gewog Adaptation Plan submitted for grant financing through CARE-LG. *Please indicate your answers to the questions below and provide mitigation measures for the response selected. If the criteria is not applicable to the project you may write N/A in the justification box*

Project Level SEAH Risks	Yes	No	Mitigation Measures
Are women concentrated in lower paid roles and mostly line-managed and supervised by men?			
Are piece-rate systems or other performance- related pay structures likely to be used where individuals are in control of how much other workers get paid?			
Will project workers have control over life- changing resources such as the allocation of compensation for displacement or access to basic or highly sought-after resources?			
Are local communities poor and lacking basic resources?			
Will migrant workers be employed by the project, especially those who may not speak the local language? Will they be employed on a temporary or daily basis?			
Will project workers all have formal contracts?			
Will goods frequently be transported over long distances, especially through poor and/or remote communities?			
Will project workers live in the community or in worker housing? If in worker housing, is it mixed sex?			
Will workers be required to travel long and potentially unsafe distances, and at times of day when transport options may be limited?			
Will the project operate in highly pressurized work environments, with tight seasonal deadlines?			
Is the project located within a male-dominated sector where female workers will be employed?			
Have communities, especially low income/ vulnerable communities, voluntarily raised concerns in relation to SEAH/GBV during consultations?			

V: Categorization

Title of Gewog Adaptation Plan:																																
Project Description:																																
<ol style="list-style-type: none"> Green initiatives and Nature-based Solutions Climate resilient and innovative agriculture and livestock practices Climate proofing of existing critical community assets/infrastructure within limits of environmental and social risk category C (activities with minimal or no adverse E&S risks and/or impacts. Disaster planning, management and response 																																
<table border="1"> <thead> <tr> <th>Safeguard standards Triggered</th> <th>Yes</th> <th>No</th> </tr> </thead> <tbody> <tr> <td>Labour and Working Conditions (Provide a summary of reasons for the option selected):</td> <td></td> <td></td> </tr> <tr> <td>Resource Efficiency and Pollution Prevention (Provide a summary of reasons for the option selected):</td> <td></td> <td></td> </tr> <tr> <td>Community Health, Safety, and Security (Provide a summary of reasons for the option selected):</td> <td></td> <td></td> </tr> <tr> <td>Land Acquisition and Involuntary Resettlement (Provide a summary of reasons for the option selected):</td> <td></td> <td></td> </tr> <tr> <td>Biodiversity Conservation and Sustainable Management of Living Natural Resources (Provide a summary of reasons for the option selected):</td> <td></td> <td></td> </tr> <tr> <td>Indigenous Peoples (Provide a summary of reasons for the option selected):</td> <td></td> <td></td> </tr> <tr> <td>Cultural Heritage (Provide a summary of reasons for the option selected):</td> <td></td> <td></td> </tr> <tr> <td>Cultural Heritage (Provide a summary of reasons for the option selected):</td> <td></td> <td></td> </tr> <tr> <td>SEAH (Provide a summary of reasons for the option selected):</td> <td></td> <td></td> </tr> </tbody> </table>			Safeguard standards Triggered	Yes	No	Labour and Working Conditions (Provide a summary of reasons for the option selected):			Resource Efficiency and Pollution Prevention (Provide a summary of reasons for the option selected):			Community Health, Safety, and Security (Provide a summary of reasons for the option selected):			Land Acquisition and Involuntary Resettlement (Provide a summary of reasons for the option selected):			Biodiversity Conservation and Sustainable Management of Living Natural Resources (Provide a summary of reasons for the option selected):			Indigenous Peoples (Provide a summary of reasons for the option selected):			Cultural Heritage (Provide a summary of reasons for the option selected):			Cultural Heritage (Provide a summary of reasons for the option selected):			SEAH (Provide a summary of reasons for the option selected):		
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<p>Project Categorization (A,B,C):</p> <p>This ESS screening is undertaken during the assessment of Gewog Adaptation Plan. Based on the review of project's risk screening, the project is categorized as:</p> <p>ESS Category ----:</p>	<p>Signed</p> <p>ESS Specialist/BTFEC</p> <p>Chief of Programs, BTFEC</p>
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Part C: Exclusion List

The PBGM grants through this project are eligible for activities that are within social and environmental category "C".

To ensure that the Gewog Adaptation Plans are aligned with environmental and social category C, the Performance Assessment Parameter under section 4 and 5 under appendix 4 of annex 2, will also include an exclusion list which will disqualify financing of Gewog Adaptation Plans that have specific risk factors and would (i) raise the overall environmental and social risks of the proposed activities to Category B or A) or (ii) require more detailed and specific assessments.

The exclusion list comprises of the following¹;

- i. Production or activities involving harmful or exploitative forms of forced labor
- ii. Use of hazardous chemicals,
- iii. Engaging in wildlife or wildlife products regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora
- iv. Production of or trade in alcoholic beverages, tobacco;
- v. Production of, trade in, or use of unbonded asbestos fibers;
- vi. Commercial logging operations or the purchase of logging equipment
- vii. Heavy construction material-related sectors;
- viii. All mining, mineral processing and extraction activities;
- ix. Activities that include permanent reduction of water flows in a watershed due to multiple withdrawals or increases in sedimentation
- x. Activities that permanently interfere with migratory routes or wildlife movement
- xi. Activities that will increase traffic congestion and accidents due to increases in vehicular traffic on community roadways

¹ Based ADB's exclusion list and description of elements that risk raising of ESS category beyond C

- xii. Activities that may potentially generate risks to the health and safety of workers involved in the activity; to the vulnerable population or employ of children.
- xiii. Activities that may generate hazardous waste, emissions to air, and effluents that would adversely impair the quality of the environment and adversely affect the health and well-being of the affected communities
- xiv. Activities will generate risks of displacement of individuals or communities (whether temporary or permanent and whether economic or physical) from the areas they are occupying or restrict access to natural resources that the communities depend on for livelihood
- xv. Any infrastructure that may be constructed, rehabilitated or expanded that has the potential to pose hazards to the environment and the communities
- xvi. Activities that may potentially affect cultural heritage including tangible and intangible cultural resources
- xvii. Introduction of Alien Invasive Species (AIS), Chemical fertilizers and pesticides.
- xviii. Any infrastructure at are beyond the following physical dimensions:

Indicative interventions	Remarks (restrictions)
Farm-level efficient and sustainable use of water for agriculture (drip irrigation, sprinkler systems or similar technologies including automation)	Any activity covering irrigation for agriculture area greater than 10 Hectares
Integrated approach to water management and other key infrastructure investments is also included for the water sector	Any activity that withdraws more than or equal to 70 % of lean season flow of a water source during lean season
Post-harvest and storage technologies and infrastructure	Any physical structure measuring beyond 1000 cubic meters