

Simplified Approval Process

Annex 12: Environmental and social action plan



GREEN
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Abbreviations

Abbreviation	Full form	Abbreviation	Full form
AE	Accredited Entity	AF	Adaptation Fund
CARM	Community Accountability Reporting Mechanism	CSA	Climate-Smart Agriculture
CIS	Climate Information System	DAE	Direct Access Entity
EE	Executing Entity	E&S	Environmental and Social
ESAP	Environmental and Social Action Plan	ESCOP	Environmental, Social, and Occupational Health & Safety Code of Practice
ESIA	Environmental and Social Impact Assessment	ESMP	Environmental and Social Management Plan
ESMF	Environmental and Social Management Framework	ESS	Environmental and Social Safeguards
FGD	Focus Group Discussion	FPIC	Free, Prior and Informed Consent
GBV	Gender-Based Violence	GHG	Greenhouse Gas
GIS	Geographic Information System	GCF	Green Climate Fund
IFC	International Finance Corporation	ILO	International Labour Organization
IPP	Indigenous Peoples Plan	IWRM	Integrated Water Resource Management
LMP	Labour Management Procedure	MCI	Mercy Corps Indonesia
MEL	Monitoring, Evaluation and Learning	MSME	Micro, Small, and Medium Enterprises
NGO	Non-Governmental Organization	OHS	Occupational Health and Safety
PIP	Project Implementation Planning	PMIU	Project Management and Implementation Unit
PS1–PS9	IFC Performance Standards 1–9	PRA	Participatory Rural Appraisal
SAP	Simplified Approval Process (of GCF)	SEA	Sexual Exploitation and Abuse
SPM	Summary for Policymakers	SOP	Standard Operating Procedure
ToR	Terms of Reference	UNESCO	United Nations Educational, Scientific and Cultural Organization
VC	Value Chain	ZFRA	Zero Flood Resilient Agriculture

1. Introduction

This Environmental and Social Action Plan (ESAP) has been developed for the project Building Flood Resilient Community through Adaptive Livelihood and Runoff Management in Petanglong Area of Central Java Province of Indonesia (BRAVE) under the GCF Simplified Approval Process (SAP) scheme. The ESAP has been prepared in accordance with the Accredited Entities' (Kemitraan) Environmental and Social Safeguards System, the GCF's GCF's Revised Environmental and Social Policy and GCF's Updated Gender Policy.

The ESAP has been prepared in accordance with the Accredited Entities' (Kemitraan) Environmental and Social Safeguards System, the GCF's Environmental and Social Policy, and Gender Policy.

The objectives of the ESAP are to assess the environmental and social impacts and risks associated with the project activities and to develop adequate mitigation measures. Approved under the SAP scheme, the project will only support activities eligible under the Category C risk category. Therefore, exclusively activities with minimal or no adverse environmental and social risks and impacts are eligible for funding. The purpose of the ESAP is to:

- Identify and assess potential environmental and social risks and impacts associated with the project's proposed activities.
- Develop targeted and proportionate mitigation measures to ensure alignment with GCF safeguard requirements and Indonesia's national regulatory framework.
- Provide a clear, time-bound, and accountable framework for addressing identified gaps.
- Ensure that project implementation fosters inclusive stakeholder engagement, integrates gender equality and social inclusion, and safeguards the rights and interests of local communities.

The project will apply Mercy Corps's full suite of safeguarding tools, including the Community Accountability Reporting Mechanism (CARM), Gender Equality and Social Inclusion (GESI) minimum standards, and safeguarding policies such as Child Protection, Sexual Exploitation and Abuse (SEA), and Code of Conduct, to ensure ethical, inclusive, and accountable implementation.

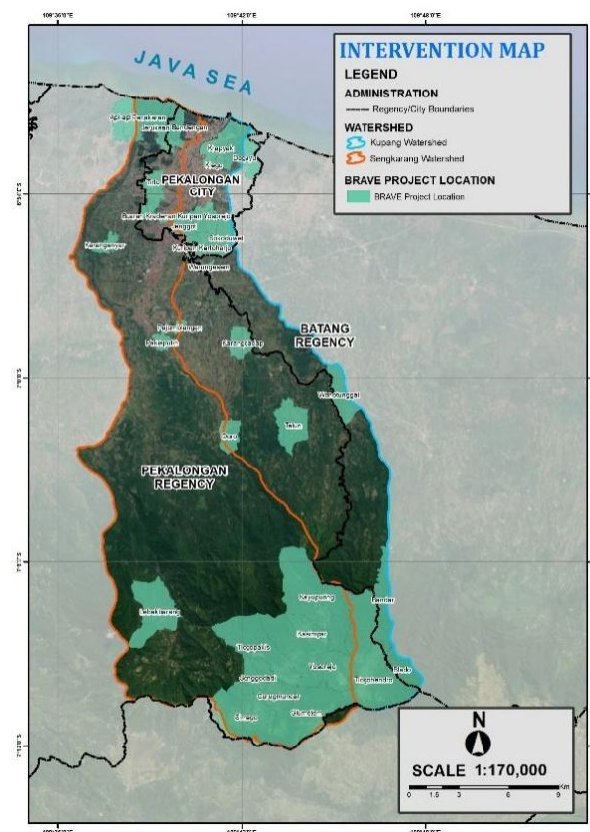
The ESAP is structured as follows. After providing a brief overview of the project activities in Chapter 2, Chapter 3 provides an assessment of the relevant policy and regulatory framework in Indonesia, highlighting potential gaps and implications for ensuring compliance with GCF safeguard policies. Chapter 4 outlines the methodology applied in the environmental and social screening process and the development of this ESAP. The main environmental and social assessment of project activities is presented in Chapter 5, including the identification of risks, proposed mitigation measures, and associated timelines. This chapter sets out the key actions required during project implementation to manage risks effectively. To guide project execution, Chapter 6 describes the screening process to be applied for any interventions requiring review during implementation. Finally, Chapters 7 and 8 provide the monitoring framework and reporting requirements, ensuring that mitigation measures and safeguards are effectively applied throughout the project lifecycle.

2. Project Overview

2.1 Project Location

Located in Central Java Province, Indonesia, the Petanglong area, encompassing Pekalongan City, Pekalongan Regency, and Batang Regency, faces escalating flood risks. Flooding is driven by a combination of intense rainfall, land-use changes, altered river morphology, and tidal influences. The coastal zone is especially vulnerable. Recurrent floods have caused

extensive infrastructure damage, permanent land loss, and severe livelihood disruptions, while placing heavy strain on municipal budgets. Moreover, the interaction between coastal changes and upstream–midstream watershed developments has amplified both the scale and complexity of flood events. With climate change expected to intensify these pressures, the physical and socio-economic impacts are likely to grow even more severe. The BRAVE project is located in the Petanglong area of Central Java Province, Indonesia, covering Pekalongan City, Pekalongan Regency, and Batang Regency. The intervention area focuses specifically on the Kupang and Sengkarang watersheds as shown in the Map below.



Map showing the intervention Area of BRAVE

2.2 Project Design

The BRAVE project applies a landscape perspective, planning interventions across agriculture, forestry, and water to balance land use needs while supporting food security, ecosystem conservation, and poverty reduction. By targeting upstream, midstream, and downstream areas, the project tackles the root causes of flooding, land degradation, and community vulnerability, while addressing barriers such as limited climate knowledge, weak governance, market failures, and gender inequities. Its activities integrate livelihoods, ecosystems, adaptive practices, capacity building, and policy reform, with gender sensitivity ensured through assessments and balanced participation. Building on the projects of MCI/ZFRA and Kemitraan Adaptation Fund initiatives and rooted in strong community consultation, the project outcomes are a direct response to systemic barriers and are designed to reinforce each other, using Outcome 1 to generate evidence, Outcome 2 to implement climate-resilient practices, and Outcome 3 to create the enabling environment for scaling and replication. The Theory of Change can be found in Annex 2c. The outputs and activities are shown below.

Outcome 1: Development planning processes in Sengkarang and Kupang watersheds are participatory and climate-informed	
<u>Output 1.1:</u> Climate-based evidence is available to targeted communities and project stakeholders for climate-resilient planning	1.1.1: Conduct climate risk and impact assessment for Sengkarang watershed and updating the climate risk and impact assessment for Kupang watershed 1.2: Develop ecosystem services valuation assessment
<u>Output 1.2:</u> Community-based climate change adaptive management plans and designs have been developed to enhance community resilience	1.2.1: Formation and strengthening of climate-resilient community groups in target villages 1.2.2: Develop community resilience action plans through inclusive stakeholder participation 1.2.3: Conduct hydrological analysis of watershed area to inform development of blue green spaces 1.2.4: Securing approval of blue green spaces sites through stakeholder validation and risk perception analysis 1.2.5: Landscape design of the blue-green space
Outcome 2: Communities in the targeted watersheds implement climate-resilient livelihoods and integrated watershed/runoff management practices that reduce climate-related risks	
<u>Output 2.1:</u> Communities in the targeted watersheds are supported to implement the climate-informed and climate-resilient livelihood options	2.1.1: Conduct climate-smart field schools for agriculture and aquaculture to promote climate-resilient farming and adaptive aquaculture practices. 2.1.2: Expand and contextualize the Climate Information System to support community resilience action plan implementation across upstream, midstream, and coastal communities, focusing on coffee, carrots, milkfish, and grouper commodities 2.1.3: Build the financial and business management capacity of farmer and fish-farmer groups to function as aggregators for their members 2.1.4: Implement participatory conservation measures and establish climate smart agriculture demonstration plots 2.1.5: Establish adaptive aquaculture demonstration plots complemented with improved feeding management practices and introduce value added schemes for women farmer groups 2.1.6: Facilitate village engagement and advocacy in upstream, midstream, downstream and coastal communities to support knowledge exchange with farmer and fish-farmer groups
<u>Output 2.2:</u> Integrated runoff management and flood preparedness systems established in targeted sub-districts	2.2.1: Conducting sectoral risk and opportunity analysis to inform establishment of Blue green spaces. 2.2.2: Provide systems and procedures for monitoring, communication and operational management of Blue-Geen Spaces 2.2.3: Securing validation of designs and establishment of blue-green spaces management working groups 2.2.4: Blue-green space establishment 2.2.5: Develop sub-district level contingency plans 2.2.6: Train local communities on flood preparedness and response
Outcome 3: Enabling environment to replicate and scale up climate-resilient IWRM exists	
<u>Output 3.1:</u> Government stakeholders, academia, private sector, community and media are informed of best practices of climate-resilient and climate-informed livelihood options, and policy recommendations.	3.1.1: Conduct policy analysis at provincial and local level to inform evidence-based policy recommendations 3.1.2: Facilitate multi-level advocacy and policy dialogues to advance the integration of Integrated Water Resources Management principles into local and provincial policies 3.1.3: Develop and disseminate a summary for policy makers based on lessons learned 3.1.4: Co-develop climate resilient IWRM framework through stakeholder consultation (to integrate landscape and climate resilience perspectives) 3.1.5: Media outreach and visibility (inc. movie) for public campaign and awareness

	3.1.6. Co-develop decision-making tools for sector-specific (CIS) with relevant local partners 3.1.7. Knowledge Management 3.1.8. Amplify the project learning and evidence to inform the climate resilience policy development at the national level
<u>Output 3.2:</u> Communities in the targeted watersheds have access to supports with climate-resilient livelihood business models and finance	3.2.1: Detailed Market scoping analysis both for agriculture and aquaculture commodities 3.2.2: Improve network with offtakers, aquaculture and agriculture input providers 3.2.3: Strengthen networks and facilitate linkages with financial institutions and technical assistance advisory groups, to improve access to finance and market opportunities. 3.2.4: Develop bundled service business models for selected aquaculture and agriculture commodities (grouper, milkfish, coffee, and carrot) and provide technical advisory services. 3.2.5. Document and disseminate lessons learned on the replication potential of business models 3.2.6 Conduct regular monitoring and evaluation on technical performance of the close loop model

The project will not undertake on lending or provide sub loans using GCF funds. The project's role will be limited to facilitation and coordination functions only, and will not include any financial intermediation activities. This clarification is included to ensure alignment with GCF requirements and to avoid any potential ambiguity during project implementation.

Chapter 2: Assessment of National Environmental and Social Requirements in Indonesia

Assessing national Environmental and Social (E&S) requirements in Indonesia is a critical step within the GCF Environmental and Social Assessment Procedure, ensuring projects comply with environmental laws, labor regulations, land acquisition procedures, and protections for Indigenous Peoples, while also ensuring alignment with GCF Environmental and Social Safeguards (ESS). This chapter provides an assessment of Indonesia's national environmental and social framework and evaluates its alignment with the GCF ESS, which are based on the IFC Performance Standards (PS1–PS9). The purpose of this assessment is to ensure that the project is designed and implemented in compliance with national laws and regulations while meeting GCF ESS requirements. Based on a preliminary review, it is necessary to identify gaps between the national regulatory framework and GCF safeguard standards and outline any project-level measures necessary to address these gaps. This helps to identify areas where local regulations may not fully meet GCF standards, for example, explicit biodiversity protections, and implement project-level measures to bridge these gaps. Integrating national Environmental and Social requirements into project design reinforces country ownership, strengthens risk management by capturing context-specific environmental and social risks, and promotes sustainable and socially responsible project outcomes in alignment with both national priorities and GCF standards. The table below presents preliminary gap analysis of relevant Indonesian laws and regulations against the nine IFC Performance Standards.

PS	National Framework Summary	Key Gaps vs GCF/PS
1	ESIA implemented through AMDAL (full ESIA), UKL-UPL (management plan), and SPPL (self-monitoring), often threshold-based; lacks explicit linkage to international treaties and area of influence analyses; minimal guidance on grievance mechanism; stakeholder engagement limited during ESIA process	1. Threshold approach differs from PS1 screening expectations 2. No explicit alignment with international treaties. 3. Weak monitoring and adaptive management. 4. Limited guidance on gender

		5. Weak grievance mechanism and stakeholder engagement obligation for the entire project implementation period.
2	Indonesia has ratified ILO conventions; national labor laws do not cover community workers; grievance mechanisms may be inaccessible; detailed risks related to labor and working environment are not included in ESIA as it falls under occupational health and safety (OHS).	1. Community workers not covered. 2. Grievance avenues may be perceived as inaccessible.
3	Comprehensive pollution prevention regulations; limited emphasis on resource efficiency.	No legal requirement for material reuse/recycling.
4	National rules cover community health and safety, but ESIA scope does not include the health, safety and security of potentially affected community and safeguarding of personnel; independent expert review for high-risk structures not mandatory.	1. No obligation for independent expert review. 2. Sexual Exploitation and Abuse (SEA)/Gender-Based Violence (GBV) guidance limited in community safety planning.
5	Law 2/2012 & Perpres 71/2012 for land acquisition; Perpres 62/2018 for informal occupants; lacks detailed resettlement planning and external monitoring; limited scope of land acquisition in ESIA and rarely discuss resettlement and its consequences.	1. Livelihood restoration and entitlements for informal occupants not fully required. 2. Resettlement instruments lack detailed surveys, vulnerable groups identification, relocation assistance (including socio-economic rehabilitation), timing, cost inclusion. 3. Disclosure venues may be inaccessible. 4. No external monitoring/post-implementation evaluation required.
6	Forestry and biodiversity laws exist; national biodiversity strategy and action plan exist, no PS6-style critical habitat assessment or thresholds for habitat conversion/degradation or ecosystem services.	1. No critical habitat screening using PS6/IUCN criteria. 2. ESIA may not include species-level risk, baselines, cumulative impacts, and also ecosystem services context. 3. No formal biodiversity offsets process. 4. Limited monitoring/adaptive management.
7	Recognizes Masyarakat Adat but requires formal recognition; land/resettlement laws rely on formal recognition.	1. Formal recognition prerequisite may exclude qualifying IPs. 2. FPIC and tailored social assessment inconsistent. 3. Limited representation/benefit sharing mechanisms.
8	Cultural heritage protection exists; chance find mechanisms implemented inconsistently; limited integration of traditional knowledge; ESIA rarely clear and incisive in cultural aspects (cultural property and heritage, historical relics, artifacts etc.).	1. Variable implementation of chance finds and intangible heritage protection. 2. Limited traditional knowledge integration.
9	Environmental and social risks may affect project-induced impacts; national framework.	1. No explicit requirement for cumulative impact assessment. 2. Limited guidance for stakeholder engagement on cumulative risks.

To understand the possible implications of these gaps on E&S risks for the BRAVE project we will further describe the E&S screening in order to understand what needs to be put in place beyond current national regulations.

Chapter 3: Environmental and Social Risks Screening

The BRAVE project underwent Environmental and Social Risks Screening (ESS) at the Concept Note stage to identify potential environmental, social, and institutional risks associated with its proposed activities (see Annex 1). The assessment concluded that project activities pose minimal adverse risks that are small-scale, site-specific, short-term, and readily mitigated. Accordingly, the project has been designated as Category C under the GCF Simplified Approval Process. Screening results indicated that project activities may have potential impacts on three Performance Standards (PS):

- PS1 – Assessment and Management of Environmental and Social Risks and Impacts
- PS2 – Labour and Working Conditions
- PS3 – Resource Efficiency and Pollution Prevention

These areas require proportionate mitigation measures, which are included in the Environmental and Social Action Plan (ESAP). For the remaining Performance Standards, no significant negative impacts were identified. The gap analysis of national regulations indicated that the project must go beyond minimum legal requirements by embedding proactive measures that promote sustainability and inclusion. This includes meeting international best practices for resource efficiency and biodiversity protection, providing a grievance mechanism accessible to all stakeholders, and maintaining meaningful stakeholder engagement throughout the project period to ensure accountability and safeguard rights beyond what is typically mandated in national law. Although classified as Category C, the project will implement proportionate safeguard measures to ensure alignment with the GCF Environmental and Social Policy and relevant IFC Performance Standards.

Following the preliminary environmental and social screening conducted at the Concept Note stage (Annex 1), additional due diligence was undertaken during the Funding Proposal preparation to confirm the project's risk categorization under the GCF Revised Environmental and Social Policy (RESP). This assessment combined desk review, stakeholder interviews, and a field mission in June 2025. Public consultations were held in two locations:

- Pekalongan City (June 23, 2025) – 18 institutions participated (13 government and 5 NGOs).
- Pekalongan Regency (June 24, 2025) – hosted by the Planning Agency, with 22 institutions participating (18 government and 4 NGOs).

Further assessments included a review of agricultural activities and scale, hydrological implications, stakeholder consultation findings, and the safeguard systems of Kemitraan and MCI. The assessment confirms that proposed activities, including climate-smart agriculture, adaptive aquaculture, and small-scale blue-green spaces, are limited in scale and footprint and will be implemented on existing managed land. They do not involve land acquisition, displacement, habitat conversion, permanent hydraulic infrastructure, labor influx, hazardous materials, or industrial-scale construction. Potential impacts are therefore expected to be site-specific, small-scale, short-term, reversible, and non-cumulative. Since the specific locations of the proposed blue-green spaces have not yet been identified, the ESAP will incorporate binding screening and exclusion criteria to ensure full alignment with a Category C classification under the GCF SAP modality. The project will commit that blue-green spaces may only be developed on uncontested public or community land that is free of informal settlers, livelihood use restrictions, or any form of encumbrance. Selected sites will be located outside legally protected areas, critical habitats, and any areas requiring land acquisition. The intervention will be limited to minor landscaping activities and will not involve permanent concrete infrastructure, deep excavation, large-scale soil removal, or any form of river diversion or hydraulic modification. Works will rely exclusively on local labor to avoid labor influx. To better clarify the ESAP will include an exclusion list which explicitly states that any site requiring land acquisition, access restriction, vegetation clearing beyond minor trimming, construction of permanent hydraulic structures, or excavation beyond minor reshaping will be excluded from the project scope (See Annex: Exclusion list). These design level restrictions ensure that potential environmental and social risks remain minimal, thereby safeguarding the project's Category C eligibility. Screening and exclusion criteria incorporated into the ESAP ensure that any activity or site presenting risks beyond minimal thresholds will be excluded prior to implementation. Based on this due diligence and the safeguards embedded in project design, the overall environmental and social risk profile of the BRAVE project remains minimal and is appropriately classified as Category C/I-3 under the GCF Revised Environmental and Social Policy. Further details on the relevant IFC Performance Standards are provided below.

PS2 – Labour and working conditions

Risks under PS2 are limited to potential gender exclusion in agriculture and aquaculture activities and minor occupational health and safety risks during small scale blue green space establishment. Activities are training based and community led, with no labor restructuring, no influx of external workers, and no hazardous construction. Blue-green spaces will involve only

minor landscaping, using local labor only and no heavy machinery. No worker camps, security personnel, or contractor mobilization are anticipated. Gender-inclusive stakeholder mapping, identification of female headed households, and implementation of a Gender Action Plan will ensure equitable access to project benefits in agriculture and aquaculture value chains. Basic occupational health and safety (OHS) procedures aligned with national regulations will be applied during minor landscaping works, including use of appropriate tools, supervision, and adherence to safety protocols as is normal procedure for Kemitraan/MCI projects.

PS3 – Resource efficiency and pollution prevention

Potential PS3 risks relate to sediment and nutrient runoff from climate-smart agriculture, effluent discharge from aquaculture ponds, and minor soil disturbance during blue–green space preparation. However, the project promotes improved nutrient management, controlled feeding practices, sediment traps, and effluent control measures consistent with best practice guidelines. CSA activities will be implemented on existing agricultural land and will not involve land use change, or expansion into protected or critical habitats. The project will not introduce GMOs. No new pesticide regimes will be financed; the project will promote integrated pest management and the use of organic or optimized fertilizer application to reduce runoff. Water usage under CSA will rely on existing water access arrangements and focus on efficiency improvements rather than increased abstraction.

With respect to blue–green spaces, works will exclude deep excavation, river diversion, permanent hydraulic infrastructure, or large-scale soil removal. Minor sediment accumulation may occur over time; however, given the shallow design and small footprint, sediment build-up is expected to be limited and manageable through periodic manual maintenance. Any sediment removed will be reused on-site for landscaping or disposed of in designated community approved areas. Waste generated from land preparation will be minimal and primarily organic in nature. Noise and emissions will be short-term, localized, and confined to daylight hours. Given the small scale, short duration, absence of industrial inputs, and preventive measures embedded in project design, environmental risks under PS3 are minimal.

PS4 – Community health and safety

Community health and safety risks are limited and manageable. The project does not involve hazardous materials, large infrastructure, land acquisition, labor influx, or permanent impoundment structures. Blue–green spaces will only be developed on uncontested public or community land, free of encumbrances and informal settlers, and located outside protected or critical habitats. Sites requiring land acquisition, access restriction, or hydraulic modification will be excluded. Stakeholder consultations identified potential concerns including vector-borne diseases, drowning risks (particularly for children and persons with disabilities), overflow during extreme rainfall, and potential SEA/SH incidents. These risks are considered minimal due to the shallow design and limited footprint of the proposed spaces. Design measures will include gradual embankment slopes, avoidance of deep basins, drainage features to prevent prolonged stagnant water, and simple overflow pathways to avoid unintended flooding. Basic community based maintenance arrangements will be established to prevent sediment blockage and water stagnation. Simple community-level emergency procedures and clear reporting channels will be incorporated into implementation arrangements. A Code of Conduct for workers and accessible grievance mechanisms will further mitigate SEA/SH risks. This is followed for all Kemitraan/MCI projects. Given the limited scale, absence of permanent hydraulic engineering, and short-term works, potential impacts remain minimal and consistent with Category C classification.

Both Kemitraan as the DAE and MCI as the EE have a strong policy on sexual harassment and inappropriate behaviour. MCI's Code of Conduct details the standards of behavior and conduct expected from the team members. MCI's Sexual Exploitation and Abuse Policy; Child Safeguarding Policy; Ethics Compliant and Whistleblower Policy; covers sexual exploitation, harassment, soliciting sexual activity, child abuse and act/threat of physical violence by staff or partner. While as part of their Social Safeguarding Policy, Kemitraan has a specific Gender Policy, Child Protection Policy, and also Discrimination, Harassment, Exploitation and Abuse Policy. The program will adhere to the above policies and thus will not pose negative impacts to the safety/security of involved actors and the surrounding community.

PS5 – Land Acquisition and involuntary resettlement

As stated in the project, it will not involve land acquisition, physical displacement, economic displacement, or restriction of access to land or natural resources. Blue–green spaces will be developed exclusively on uncontested public or community-owned land that is free of informal settlers, livelihood users, or any other encumbrances. Site screening criteria requires confirmation from relevant local authorities and community representatives that selected land is unoccupied, free of disputes, and not subject to customary or informal use rights. Any site where informal settlers, economic users, or access restrictions are identified will be excluded from the project scope during the assessment stage. The reference to private land participation applies solely to climate smart agriculture and aquaculture activities, which are voluntary livelihood interventions implemented on existing privately managed agricultural or aquaculture plots. These activities do not involve land acquisition, land consolidation, expansion, or change in land tenure status. Participation will be fully voluntary and documented. Blue–green spaces, by design, are intended as public or community assets and will not be developed on private land. These structural design commitments ensure that PS5 is not triggered beyond minimal risk and that the project remains consistent with Category C classification.

PS6 – Biodiversity conservation and sustainable management of living natural resources

The project will not be implemented in legally protected areas or critical habitats. The reference to essential ecosystem region does not automatically constitute a legally protected area equivalent to a conservation reserve. Due diligence will confirm the legal status of proposed intervention sites and alignment with existing ecosystem management plans. Consultations with relevant environmental authorities will be undertaken to ensure that activities are consistent with regional ecosystem management objectives. CSA activities will not involve land clearing, deforestation, or conversion of natural habitats. Vegetation removal for blue–green spaces will be limited to minor trimming of grasses or shrubs; no clearing of natural forest or ecologically significant vegetation will be permitted. Sites requiring vegetation clearing beyond minor landscaping will be excluded. With respect to aquaculture, the project will not introduce invasive or non-native species. Activities will prioritize existing locally farmed species and improved management practices rather than species substitution. No introduction of genetically modified organisms will occur. Improved feeding and effluent management practices will reduce potential downstream ecological impacts. Other project components, including aquaculture and blue–green spaces, will not be located within legally protected areas. Screening procedures embedded in the ESAP will ensure exclusion of protected or critical habitats. Given the absence of habitat conversion, invasive species introduction, or land use change, risks under PS6 are minimal.

PS8 – Cultural Heritage

Blue–green space development will involve only minor landscaping and shallow earth reshaping. Deep excavation, large-scale earthworks, or infrastructure construction will not be undertaken. In the unlikely event that physical cultural resources are encountered during minor excavation, works will be halted and relevant authorities notified in accordance with national regulations. Given the limited excavation depth short duration of works, and prior site screening in coordination with local authorities, risks to cultural heritage are considered negligible and consistent with Category C.

The potential risks and mitigation measures are captured in the Table below.

Performance Standard	Key Potential Risks (Low/Minimal)	Mitigation Measures (Proportionate to Low Risk)
PS2 – Labour and Working Conditions	<ul style="list-style-type: none"> • Potential gender exclusion in agriculture and aquaculture activities • Minor occupational health and safety risks during small-scale landscaping works 	<ul style="list-style-type: none"> • Gender- inclusive stakeholder mapping and implementation of the Gender Action Plan • Identification and inclusion of femaleheaded households • Application of basic OHS procedures, supervision, and safe tool use • Use of local labor only, avoiding labor influx
PS3 – Resource	<ul style="list-style-type: none"> • Sediment and nutrient runoff from 	<ul style="list-style-type: none"> • Improved nutrient management and

Efficiency and Pollution Prevention	climate smart agriculture <ul style="list-style-type: none"> • Effluent discharge from aquaculture ponds • Minor soil disturbance during blue green space establishment 	integrated pest management <ul style="list-style-type: none"> • Controlled feeding practices and effluent management • Installation of sediment traps and runoff controls • Reuse or appropriate disposal of sediments and organic waste • Efficient water use practices using existing water access arrangements
PS4 – Community Health and Safety	<ul style="list-style-type: none"> • Vector borne disease risk due to stagnant water • Drowning risks (particularly for children and vulnerable persons) • Overflow risks during heavy rainfall • Potential SEA/SH risks 	<ul style="list-style-type: none"> • Safe design planning including shallow depths, gradual embankment slopes, avoidance of deep basins, and clearly defined access points • Installation of visible safety signage around blue–green spaces • Implementation of community awareness training on safe use of spaces and emergency response procedures • Establishment of regular maintenance schedules to prevent sediment accumulation and ensure proper drainage • Design features to prevent stagnant water, including drainage pathways and water flow management • Community based vector borne disease awareness and prevention measures • Shallow design with gradual embankment slopes • Drainage features to prevent stagnant water • Accessible grievance mechanisms
PS5 – Land Acquisition and Involuntary Resettlement	<ul style="list-style-type: none"> • Risk of land disputes or unintended livelihood restriction (very low likelihood) 	<ul style="list-style-type: none"> • Development restricted to uncontested public or community land • Site verification confirming land is free of disputes and informal users • Exclusion of sites requiring land acquisition or access restriction • Voluntary participation in agriculture and aquaculture activities
PS6 – Biodiversity Conservation	<ul style="list-style-type: none"> • Minor vegetation trimming impacts • Potential ecological impacts from aquaculture practices (minimal) 	<ul style="list-style-type: none"> • Exclusion of protected areas and critical habitats • Limiting vegetation removal to minor trimming only • No introduction of invasive or non-native species • Improved feeding and effluent management practices • Compliance with ecosystem management plans
PS8 – Cultural Heritage	<ul style="list-style-type: none"> • Chance discovery of physical cultural resources during shallow excavation (unlikely) 	<ul style="list-style-type: none"> • Immediate work stoppage if cultural artifacts are encountered • Notification of relevant authorities • Limitation of works to shallow excavation and minor landscaping

Chapter 4: The Environmental and Social Action Plan

ESAP sets out mitigation measures with corresponding timelines, indicators, responsible parties, and budget allocations. The responsible party for day-to-day management and adherence to safeguards is the Project Management and Implementation Unit (PMIU), overseen by the Executing Entity (EE), Mercy Corps Indonesia, and the Accredited Entity (AE), The Partnership for Governance Reform (Kemitraan). The MEL expert, leads on safeguards compliance in the project.

To ensure effective implementation of environmental and social safeguards throughout the BRAVE project, Mercy Corps Indonesia applies a set of institutional safeguard tools. These include the Community Accountability Reporting Mechanism (CARM) for capturing and addressing stakeholder feedback, and Gender Equality and Social Inclusion (GESI) minimum standards to ensure inclusive participation, especially of women and vulnerable groups. The project also adheres to MCI's safeguarding policies, which encompass child protection, prevention of sexual exploitation and abuse (SEA), ethical conduct, and safeguarding risk assessments to identify and mitigate potential protection-related risks. For technical interventions such as blue-green spaces, Environmental, Social, and Occupational Health and Safety Codes of Practice will be developed if needed. In addition, all staff and stakeholders will receive safeguarding sensitization and training using Mercy Corps's standard modules, facilitated by the MEL Officer and internal Safeguarding Specialist. A more detailed assessment of the main intervention E&S risks and responses is provided below.

Landscape Resilience Assessment Developed						
Summary of risks	Risk	Mitigation measures	Responsible person (S)	Schedule	Expected results	Cost/ Budget
<ul style="list-style-type: none"> - Activity 1.1 Conduct climate risk and impact assessment for Sengkarang watershed (with long-term/decadal projections) - Activity 1.2 Develop resilient livelihood assessment linking climate risks with the targeted commodities 						
Results of the assessment may be ineffective or counterproductive due to overlaps or conflicts with ongoing or unplanned government initiatives and/or dynamic environmental changes in the Petanglong coastal area	Low	<ul style="list-style-type: none"> - Establish formal (PMIU) and informal coordination channels with relevant government departments and other actors working in the Petanglong coastal area. - Stakeholder engagement: maintain close and continuous engagement with government actors at national, provincial, and local levels to track ongoing and planned activities. - As part of the Project Implementation Planning (PIP) identify potential overlaps with government initiatives and adjust the project plan accordingly. - Through adaptive management periodically review project activities against emerging environmental and institutional changes to identify and resolve conflicts early. 	PMIU Executive Director Program Manager (PM)	Continuous engagement with government actors, monitoring environmental changes, and updating plans as needed. Periodic reviews: Regularly review and adapt activities to address emerging conflicts or overlaps.	Project interventions are aligned with government initiatives. Emerging risks are addressed early, and implementation is adaptive and well coordinated.	Included in project budget
Exclusion of women and vulnerable groups in the assessments	Low	<ul style="list-style-type: none"> - Apply gender-sensitive, participatory assessments (FGDs, PRA). - Quotas/representation (≥40% women, vulnerable groups). - Feedback mechanisms by using MCI's Community Accountability Reporting Mechanism (CARM) as the grievance 	MEL	Continuous with special focus during early-stage project development and outreach.	Women, and vulnerable groups are actively included in assessments. Assessment findings reflect the perspectives and	Included in project budget (covers facilitation of PRA sessions, data collection, and reporting).

		channel. CARM will be communicated in every stakeholder event. <ul style="list-style-type: none"> - Collect sex-disaggregated data. - Apply MCI GESI minimum standards. - Conduct safeguarding risk assessment - Deliver safeguarding sensitization/training using Mercy Corps's modules 			needs of women and vulnerable groups.	
Use of incomplete or outdated data leading to poor design	Low	<ul style="list-style-type: none"> - Use most recent climate risk datasets (national sources) that validated with local data (from climatology station or the installed community-based weather station). - Ground-truthing via participatory mapping. - Peer review with experts/ universities. 	PM GIS and Mapping Expert	Initial focus during early assessments. Periodic updates as new datasets become available.	Assessments and plans are based on accurate, up to date data. Decisions reflect current climate risks and local conditions.	Included in project budget (covers data acquisition, validation workshops involving experts).

Climate Resilient Community Groups Formed and Capacitated						
Summary of risks	Risk level	Mitigation measures	Responsible person	Schedule	Expected results	Cost/ Budget
<ul style="list-style-type: none"> - Activity 2.1 Formation of climate-resilient community groups in target villages - Activity 2.2 Capacity building on risk-informed planning, gender-sensitive approaches, use of climate information, and disaster response that tailored to the specific interventions planned in the area 						
Resistance may arise from upstream local CSOs or the community if they do not recognize the urgency of resilience building. Low understanding or adoption of climate	Low	<ul style="list-style-type: none"> - Detailed stakeholder mapping to determine the potential community groups member and capacity building participants, including vulnerable groups - Conduct capacity-building workshops tailored to literacy and local languages. 	Upstream Area Lead	Group formation and awareness sessions in the early years.	Groups understand and apply climate information; increased adoption of resilience practices; reduced resistance.	Training materials, digital/printed climate info, trainers, follow-up visits (including mentoring

information in planning.		<ul style="list-style-type: none"> - Use participatory training methods and tools. - Provide printed and digital climate information summaries for each group. 				sessions/discussions) are included under activities.
Exclusion of women, vulnerable groups in community groups	Low	<ul style="list-style-type: none"> - Set quotas and ensure diverse representation in all community groups. - Use gender-sensitive facilitation tools during group formation. - Conduct awareness sessions on inclusivity and participation rights. - Monitor attendance and participation by sex, age, and social group. - Apply MCI GESI minimum standards 	<p>MEL</p> <p>Upstream Area Lead</p> <p>Coastal Area Lead</p>	<p>Group formation and awareness sessions in the early years.</p> <p>Continuous monitoring of participation throughout the year.</p>	<p>Community groups are formed with a minimum of 40% women and vulnerable groups.</p> <p>Awareness raising and training include gender-sensitive approaches.</p>	Facilitation, training, participatory mapping, monitoring, and reporting are covered in the activity budget.
Social conflict might occur due to a feeling of unequal opportunity for involvement in the community groups.	Low	<ul style="list-style-type: none"> - Participatory stakeholder mapping is done early to determine community groups member and capacity building participants, including vulnerable groups ensuring a capacity-building process that strengthens groups that may feel excluded. - Facilitate clear group charters and roles/responsibilities. - Apply participatory decision-making processes. - Provide conflict resolution training. - Apply grievance recourse mechanism, by utilizing MCI's Community Accountability Reporting Mechanism (CARM). - Conduct safeguarding risk assessment - Deliver safeguarding sensitization/training using Mercy Corps's modules 	<p>PMIU</p> <p>MEL</p>	Communicate CARM and Safeguarding Policy at the beginning of the project and apply throughout.	<p>Resistance to resilience building minimized; equitable involvement achieved; vulnerable groups strengthened.</p> <p>Reduced conflict; equitable involvement; transparent and accountable group processes.</p>	Stakeholder mapping, facilitation, training, CARM application and monitoring are included in the overall project budget.

Climate-informed Land Use, Water Resource, and Livelihood Action Plans Developed						
Summary of risks	Risk	Mitigation measures	Responsible person	Schedule	Expected results	Cost/Budget
<i>Activity 3.1 Conduct participatory planning with community groups, local government, and sectoral agencies</i> <i>Activity 3.2 Integrate climate risk projections into land use, conservation, and livelihood planning</i> <i>Activity 3.3 Development of an integrated participatory land use and water resource management plan and resilient livelihood action plan/blue-green space management</i>						
Inaccurate integration of climate risk projections into land and water plans	Low	<ul style="list-style-type: none"> - Apply the most up-to-date climate risk and vulnerability assessments - Use the latest national and local climate datasets. - Conduct scenario modeling and ground-truthing. - Peer review by technical and academic experts. - Document assumptions and data sources for transparency. 	Project Coordinator GIS and Mapping Expert	Early stage, prior to plan formulation. Completed in years 1 and 2	Accurate, climate-informed land and water management plans; transparent data usage documented	Included in the overall project activity budget
Misalignment of land use and water management plans with community needs	Low	<ul style="list-style-type: none"> - Conduct a rapid appraisal prior to planning to identify community concerns, needs, and vision. - Apply participatory approaches to ensure community aspirations are reflected in the plan. Prioritize vulnerable groups in project benefits. - Integrate plans into Village Development Plans (RKPDes) for continuity and ownership. - Apply CARM as grievance mechanisms to address any concerns. 	Project Coordinator Sustainable Landscape specialist	Develop plans at the beginning of the project. Also, in time to align with the development of the RKPDes	Community ownership and support of the plans. Equitable access for marginalized groups.	Costs included for consultations, rapid appraisals, and participatory workshops.
Exclusion of women and vulnerable groups		<ul style="list-style-type: none"> - Conduct gender-sensitive, participatory planning workshops. 	MEL	In early stages, aligned with	Equitable participation: gender	Cost included for workshops,

The potential location for blue-green space may currently be used by the community for socio economic purposes, which could lead to social resistance from current users during design phase	Low	<ul style="list-style-type: none"> - Location selection to involve technical and socio-economic analysis. - Develop blue-green space only on government-owned land, including village land (co-agreed with local government and/or village officials). - Conduct participatory mapping and community consultations. - Secure permissions from village heads, landowners, and residents. - Document agreements to prevent future disputes. - Implement grievance mechanism for any conflicts under the CARM. - Undertake Environmental and Social Risk Assessment for all intervention options for the blue green space during implementation phase (see chapter 5). 	PM Project Coordinator ESS Specialist	Developed in the first year, then, securing permissions and agreements in year 2, followed by technical design.	<p>Community engagement completed; social conflicts minimized.</p> <p>Permissions and agreements documented for transparency and long-term compliance.</p> <p>Blue-green space established with full support from stakeholders.</p> <p>CARM functional and responsive.</p>	<p>Costs for consultations, participatory mapping, technical site assessments, documentation, grievance system setup are all included.</p> <p>There are also costs for ESIA during design to ensure they do not contravene Category C. See chapter 5 of the ESAP.</p>
The blue-green space, design may trigger environmental and social safeguards	Low	<ul style="list-style-type: none"> - All blue-green space options will be assessed (see Annex 2) and only options that meet Category C will be allowed. This will ensure that the space is not a hard structure, and the risks are minimal, localized, and can be easily mitigated - Any possible risk will be closely monitored (See Annex 3). - Develop risks communication procedure (part of project activity) - If determined necessary, support the development of site-specific ESCOP (Environmental, Social, and OHS Code of Practice). 	PMIU ESS	Risk screening is conducted during project design and prior to construction.	<p>Only low-risk (Category C) blue-green space options are implemented; hard structures and high-risk activities are avoided</p> <p>Compliance with environmental and social safeguards.</p> <p>Minimized localized risks with cost-effective mitigation.</p>	Costs are included in the budget for the assessment of the blue-green space.

Potential minor impact on soil and water quality during mapping and preliminary site work		- Minimize soil disturbance during field surveys.	Upstream Lead	During mapping and field surveys (Year 1).	Soil and water quality preserved during scoping site activities.	Costs are included in mapping and field inspection budget
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Climate Smart Agriculture Implemented in Upstream and Midstream Villages						
Summary of risks	Risk	Mitigation measures	Responsible party/person	Schedule	Expected results	Cost/Budget
<ul style="list-style-type: none"> - Activity 5.1 Conduct climate-smart Field School for agriculture - Activity 5.2 Establish climate-smart agriculture demonstration plots - Activity 5.4 Strengthen the capacity of farmer groups - Activity 5.5 Develop participatory conservation plans in upstream and mid-stream areas - Activity 5.6 Implementation of conservation measures 						
Potential dependency on ecosystem services (water, soil) ecosystem stress.	Low	<ul style="list-style-type: none"> - Apply integrated land and water management. - Promote good agriculture practise principle, such as water-efficient irrigation. - Encourage soil conservation techniques. - Conduct adaptive management reviews to minimize. 	Sustainable Landscape specialist	During CSA training, demo plot establishment, and implement- (Years 2–5)	Ecosystem stress minimized. Sustainable soil and water use ensured.	Included under CSA training, demo plot, and monitoring budget
Use of fertilizers or practices that could affect soil/water quality	Low	<ul style="list-style-type: none"> - Promote organic fertilizers or biofertilizers. - Nutrient management and soil health. - Using CIS to schedule activities to minimize runoff risk. - Integrate CSA into sustainable land management plans. 	Livelihood Specialist	Continuous, with soil/water monitoring.	Soil and water quality are maintained.	Included in CSA activity costs (demo plots, monitoring)
Incorrect implementation of	Low–	<ul style="list-style-type: none"> - Conduct CSA Field Schools and hands-on training. 	Livelihood Specialist	During field schools and	Correct CSA implementation.	Included in CSA training and

climate-smart practices (poor yield or maladaptation) and guidance.		<ul style="list-style-type: none"> - Establish demonstration plots for learning. - Provide technical manuals and local adaptation guidance. - Engage agronomists for trainings and advisory. 		<p>training and demo plot setup (years 2–3)</p> <p>Refresher support years 2–5</p>	<p>Improved yields.</p> <p>Adaptation achieved.</p>	technical support budget.
Exclusion of women, youth, and vulnerable groups from CSA activities. This could lead to poor gender representation and prevent female farmers from obtaining optimum project benefits.	Low	<ul style="list-style-type: none"> - Apply gender-sensitive participatory planning. - Ensure quotas or targets for women, youth, and marginalized farmers. - Conduct awareness and inclusion workshops. - Use CARM as grievance mechanism to address exclusion issues. - Apply MCI GESI minimum standards 	MEL	During beneficiary targeting and group formation (years 1–2); Continuous monitoring.	Women, youth, and vulnerable groups actively included and benefit from CSA.	Covered under facilitation, training, and gender inclusion budget.
Resistance may occur as climate-smart agriculture introduces different methods and advanced technology, challenging rural communities unexposed to such systems and potentially leading them to resist shifting from conventional local wisdom. Unsatisfied voices on location selection could lead to social conflict.	Low	<ul style="list-style-type: none"> - Awareness raising and CSA trainings highlighting benefits and reduced costs. - Trainings will emphasize how the system aims to enhance conventional local wisdom by integrating climate context within. - The priority issues, commodities, and location selection will be discussed rigorously with various local stakeholders. - CARM will be in place and continuously communicated to stakeholders to address dissatisfaction. 	Livelihood Specialist	<p>During awareness sessions and CSA rollout (years 2–4).</p> <p>Grievance handling continuous.</p>	Community acceptance of CSA practices. Conflicts minimized	Included in training, facilitation, and grievance handling budget
Water pollution may occur due to sedimentation and nutrient flow to water	Low	<ul style="list-style-type: none"> - Promote climate-smart and conservation agriculture practices (e.g., contour planting, mulching, terracing) to minimize soil erosion. 	Livelihood Specialist	Continuous monitoring during CSA	Reduced erosion/runoff. Water quality maintained.	Included in CSA demonstration, training, and monitoring budget

bodies, resulting from resilient agriculture practices.		<ul style="list-style-type: none"> - Apply buffer strips/vegetative barriers/sediment traps near water bodies or around the farmland area to filter and trap sediment and nutrients. - Encourage the use of organic fertilizer and integrated pest/nutrient management instead of chemical-based inputs. - Provide farmer training on soil and water conservation techniques and monitoring of runoff impacts. - Establish demo plots to showcase sustainable practices and monitor environmental effects. 	Sustainable Landscape Specialist	<p>implementation-.</p> <p>Water quality assessments (years 2–5)</p>	Sustainable farming practices are adopted.	
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Adaptive Aquaculture is Implemented by Aquaculture Farmer Groups						
Summary of risks	Risk	Mitigation measures	Responsible party/ person	Schedule	Expected results	Cost/Budget
<ul style="list-style-type: none"> - Activity 6.1 Conduct climate-smart field school for aquaculture, which include training of adaptive aquaculture practices - Activity 6.2 Establish adaptive aquaculture demo plots - Activity 6.3 Strengthen the capacity of fishfarmer groups - Activity 6.5 Improve feeding management (ingredients, frequency, efficiency) - Activity 6.6 Introduce value-added schemes for aquaculture products (women's groups focus) 						
Use of feed or practices that could impact water quality	Low	<ul style="list-style-type: none"> - Promote sustainable feeding management (ingredients, frequency, efficiency). - Monitor water quality regularly. - Avoid chemicals or harmful inputs - Promote the avoidance of chemical inputs to eradicate predatory fish. 	Livelihood specialist	<p>Continuous during aquaculture activities (years 12–5)</p> <p>Water quality monitoring</p>	<p>Water quality maintained.</p> <p>Sustainable aquaculture practices adopted.</p>	Included under CSA/aquaculture activity budget (training, monitoring, demo plots)

		<ul style="list-style-type: none"> - Encourage agreements among neighboring fishfarmers to adopt sustainable aquaculture practise 				
Dependency on ecosystem services (water, fish stocks)	Low	<ul style="list-style-type: none"> - Promote integrated water and land management. - Apply adaptive management strategies - Monitor water quality and fish stock status in the neighboring pond. 	Livelihood Specialist	During implement- of adaptive aquaculture activities	Ecosystem and fish stocks maintain. Aquaculture production sustained.	Included under technical support and monitoring budget
Occupational health and safety risks	Low	<ul style="list-style-type: none"> - Ensure safe storage and handling of feed and equipment. - Monitor compliance with OHS standards. 	Livelihoods specialist	Continuous during all aquaculture activities (Years 2–5)	Safe working conditions. Reduced accidents and injuries.	Included under budget.
Poor adoption of adaptive aquaculture practices	Low	<ul style="list-style-type: none"> - Conduct climate-smart aquaculture Field Schools. - Establish demonstration plots. - Provide technical guidance manuals. - Engage aquaculture specialists for trainings and advisory. 	Livelihood Specialist	During Field Schools and demo plot setup (years 2–2); refresher support years 2–5	Correct implementation of adaptive aquaculture. Improved yields.	Included under CSA/ aquaculture training and technical support budget.
Exclusion of women, youth, and vulnerable groups from aquaculture activities	Low	<ul style="list-style-type: none"> - Apply participatory decision-making, ensuring representation of women, youth, and vulnerable groups in consultations. - Prioritize women’s groups for value-added activities. - Conduct inclusive workshops and training. - Use CARM as grievance mechanism. - Apply MCI GESI minimum standards - Conduct safeguarding risk assessment - Deliver safeguarding sensitization/training using Mercy Corps's modules 	MEL	During beneficiary targeting and group formation (years 1–2); continuous monitoring.	Women, youth, and vulnerable groups actively included; equitable access to benefits.	Covered under facilitation, training, and gender inclusion budget.

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Runoff management through Blue-Green Spaces established						
Summary of risks	Risk	Mitigation measures	Responsible party/person	Schedule	Expected results	Cost/Budget
<ul style="list-style-type: none"> - Activity 7.1 Establishment of blue-green space design and management working group consisting of government officials, village representatives, and project team - Activity 7.2 Physical and hydrological design of the blue green space - Activity 7.3 Landscape design of the blue-green space - Activity 7.4 Provide systems and procedures for monitoring and communication of blue-green space risks - Activity 7.5 Public consultation for validation of blue-green space design - Activity 7.6 Blue-green space establishment 						
Potential conflicts over land use or access with local communities during early stages	Low	<ul style="list-style-type: none"> - Public consultation for validation of blue-green space design. - Form Blue-Green Space working group with government officials, village representatives, and project team to introduce blue green space. - Secure permissions from landowners, village heads, and residents. - Systems and procedures for monitoring and communication of blue-green space risks - Implement CARM as grievance mechanism to address conflicts. 	PMIU ESS Specialist	Early establishment phase (Q4 Year 1 - Q2 Year 2).	Community engagement completed. Social conflicts minimised. Permissions documented	Included under consultation, facilitation, and stakeholder engagement budget.
Potential impact on soil and water quality	Low	<ul style="list-style-type: none"> - A detailed hydrological and environmental analysis will be 	PMIU ESS specialist	During site preparation and	Minimal soil disturbance.	Included under technical design, environmental

Water pollution from sediment transportation during the land preparation phase. Development may also alter sediment flow, runoff patterns and water catchment potential in other areas.		<p>conducted during the design process (activity 1.3) to confirm feasible locations that avoid detrimental impacts on infiltration. Mitigation measures to control sediment flow and surface runoff will be developed and implemented.</p> <ul style="list-style-type: none"> - Minimize soil disturbance during construction. - Apply erosion and sediment control measures. - Avoid chemicals and pollutants during establishment. - Provide systems and procedures for monitoring and communication of blue-green space risks. 	<p>Project Coordinator</p> <p>Sustainable Landscape</p> <p>ESS specialist</p>	<p>establishment (months 3–12).</p> <p>Monitoring across project.</p>	<p>Sedimentation and water pollution controlled.</p> <p>Hydrological integrity maintained.</p>	<p>assessment, and monitoring budget.</p>
Exclusion of vulnerable groups from planning and management	Low	<ul style="list-style-type: none"> - Ensure participation of women, and other vulnerable groups in consultations - Use accessible venues and communication methods. - Record attendance and participation. - Apply CARM as a channel to give feedback regarding exclusion if such situation occurs. - Conduct safeguarding risk assessment - Deliver safeguarding sensitization/training using Mercy Corps's modules 	<p>Project Coordinator</p> <p>MEL</p>	<p>During planning and consultation (months 1–6); continuous monitoring throughout the project.</p>	<p>Equitable participation; inclusive planning; vulnerable groups' perspectives incorporated.</p>	<p>Included under consultation, training budget</p>
Long term maintenance and sustainability risks	Low	<ul style="list-style-type: none"> - Provide systems and procedures for monitoring and communication of blue-green space risks. 	<p>PMIU</p> <p>Working Group</p>	<p>During establishment (months 6–12) and ongoing post-</p>	<p>Sustainable operation of blue-green space.</p> <p>Clear local management;</p>	<p>Included under training, community engagement, and</p>

		<ul style="list-style-type: none"> - Develop management and maintenance plan with local communities. - Train local committees on monitoring and upkeep. - Establish clear roles and responsibilities for management. 	Local Communities	establishment (years 2–5)	ecological and social outcomes monitored.	maintenance budget.
Workers exposed to safety and health risks during blue-green space establishment	Low	<ul style="list-style-type: none"> - Development of OHS procedure that align with applicable regulations - Induction/trainings on OHS procedures and code of ethics for workers/contractors - Monitoring - Apply CARM as grievance mechanism - Conduct safeguarding risk assessment - Deliver safeguarding sensitization/training using Mercy Corps's modules 	PMIU ESS specialist	Throughout blue-green space establishment period (Year 3-Year 4)	Safe working conditions	Included in blue-green space establishment budget

Sub District Contingency Plan Established						
Summary of risks	Risk	Mitigation measures	Responsible party/person	Schedule	Expected results	Cost/Budget
<ul style="list-style-type: none"> - Activity 8.1 Develop sub-district contingency plans - Activity 8.2 Train local communities on flood preparedness and response 						
Inadequate preparedness for flood or extreme weather events		<ul style="list-style-type: none"> - Conduct risk and vulnerability assessments at sub-district level. 	PMIU	Planning and development phase.	Sub-districts prepared for floods/extreme events.	Included under contingency planning.

		<ul style="list-style-type: none"> - Develop sub-district contingency plans incorporating flood and climate risks. - Include scenarios for extreme weather events, and incorporate CIS information where feasible - Coordinate with local government and emergency services. 	GIS and Mapping officer Local Government	Ongoing updates annually.	Response mechanisms in place.	assessment, and training budget.
Lack of community capacity to respond to emergencies	Low	<ul style="list-style-type: none"> - Train local communities on flood preparedness and response. - Conduct workshops and simulation exercises. - Provide educational materials and awareness campaigns. 	PMIU Working Group Local Communities	Trainings on Year 3 (Q3-Q4); refresher exercises annually.	Communities capable of responding to emergencies. Reduced disaster impacts.	Included under contingency planning and response training budget
Coordination gaps among local stakeholders	Low	<ul style="list-style-type: none"> - Establish clear roles and responsibilities among local government, village officials, and community groups. - Regular coordination meetings of the blue-green space management working group. - Set up communication protocols and reporting channels. 	PMIU Working Group	Throughout planning and implementation.	Good coordination among stakeholders. Timely communication. Effective contingency operations.	Included under working group establishment, consultation budget
Risk of plan not being updated with changing climate and flood patterns	Low	<ul style="list-style-type: none"> - Include adaptive management approach in the contingency plan. - Periodically review and revise plans based on updated climate information from CIS. - Integrate lessons learned from past events. 	PMIU GIS and Mapping officer	Regularly updated.	Contingency plan remains relevant; adaptive to changing climate/flood conditions.	Included under contingency planning budget

Contingency plan do not take account of the specific needs and concerns of gender and vulnerable groups	Low	<ul style="list-style-type: none"> - Ensure participation of women and other vulnerable groups in the planning process - Use accessible venue and communication methods for discussions - Ensure the information delivery mechanism is suitable and accessible for gender and vulnerable groups - Apply CARM as grievance mechanism - Apply GESI minimum standards - Conduct safeguarding risk assessment - Deliver safeguarding sensitization/training using Mercy Corps's modules 	PMIU MEL	During contingency plan development Regular monitoring and updating if needed	Concerns and needs of gender and vulnerable groups are addressed in the contingency plan	Included under contingency planning, consultations budget
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Knowledge Management and Capacity Building System Established						
Summary of risks	Risk	Mitigation measures	Responsible	Schedule	Expected results	Cost/Budget
<ul style="list-style-type: none"> - Activity 9.1 Conduct policy analysis at provincial and local levels to determine policy recommendations - Activity 9.2 Multi-level advocacy and policy dialogues with government, academicians, the private sector, communities, media - Activity 9.3: Develop and disseminate a summary for policy makers (SPM) based on lessons learned 						
Exclusion of key stakeholders in policy analysis and development	Low	<ul style="list-style-type: none"> - Conduct multi-level stakeholder mapping. - Ensure inclusion of government, community groups, private sector, and vulnerable populations. 	Advocacy Focal Point	Policy analysis and SPM development Year 2-Year 3; consultations	All relevant stakeholders actively engaged; policy recommendations inclusive of diverse perspectives	Included under stakeholder mapping, workshops, and facilitation budget.

		<ul style="list-style-type: none"> - Use participatory workshops and consultations. - Apply CARM as grievance mechanism 		throughout project		
Risk of recommendations being ignored by decision-makers	Low	<ul style="list-style-type: none"> - Engage policymakers throughout the process through consultations and advocacy. - Develop clear, actionable recommendations. - Produce summaries for policymakers (SPM). - Coordinate with media and relevant networks for dissemination. 	PMIU Advocacy Focal Point	Throughout project; advocacy and disseminate.	Recommendations are understood, considered, and adopted by policymakers; improved policy uptake.	Included under advocacy, SPM development, and dissemination budget.
Potential inequity in policy outcomes	Low	<ul style="list-style-type: none"> - Ensure recommendations consider gender, vulnerable groups, and marginalized populations. - Conduct social impact assessment of proposed policies. - Include inclusive approaches in all policy briefs. 	Advocacy Focal Point	During policy drafting and review.	Policies equitable; benefits distributed fairly among all groups.	Included staff time.

Enabling Policy Frameworks Adopted for Climate-Resilient IWRM						
Summary of risks	Risk	Mitigation measures	Responsible person	Schedule	Expected results	Cost/Budget
<ul style="list-style-type: none"> - Activity 10.1 Co-develop climate-resilient IWRM framework through stakeholder consultation (to integrate landscape and climate resilience perspectives) - Activity 10.2 Provide decision-making tools for sector specific (climate information system) - Activity 10.3 Advocate for inclusion of IWRM principles in local/provincial policies 						
Delays in policy adoption and/or missed policy window due to bureaucratic processes	Low	<ul style="list-style-type: none"> - Engage policymakers early and continuously. - Develop a clear advocacy strategy. - Identify and leverage champions within government agencies. 	PMIU Advocacy Focal Point	Stakeholder consultation and advocacy throughout.	Timely adoption of climate-resilient IWRM frameworks.	Included under advocacy works budget.

		<ul style="list-style-type: none"> - Align recommendations with existing regulatory frameworks. - Close monitoring of policy window 			Streamlined bureaucratic processes.	
Inadequate integration of climate resilience and landscape considerations	Low	<ul style="list-style-type: none"> - Conduct multi-stakeholder consultations to integrate IWRM and climate-resilience perspectives. - Co-develop frameworks with technical experts. 	PM	Framework drafting and review (Year 3- early Year 4.	Policies fully integrate climate and landscape resilience perspectives. Technically robust frameworks.	Included under advocacy works, policy dialogue budget
Limited uptake by local/provincial authorities	Low	<ul style="list-style-type: none"> - Provide decision-making tools (e.g., climate information system) to support adoption. - Produce and gather compelling evidence, and strategically frame it to align with the key IWRM challenges and priorities specific to each administrative area. - Develop a communication strategy tailored to the specific characteristics of each key policy actor - Conduct trainings and capacity-building workshops. - Conduct multi-level policy dialogue 	PM Project Coordinator Advocacy Focal Point	Training and tool deployment (Year 2) Evidence generation and SPM development (Year 1 and Year 3) Advocacy throughout project	Local/provincial authorities actively use frameworks and tool. Improved policy uptake.	Included under advocacy works budget.
Risk of inadequate stakeholder participation or communication breakdowns that could hinder project acceptance or success.	Low	<ul style="list-style-type: none"> - Ensure frameworks consider gender, marginalized communities, and vulnerable populations. - Conduct gender and social impact assessments. - Include mechanisms for inclusive participation and benefit-sharing. - Employ inclusive and transparent stakeholder engagement processes. - Use multiple channels for effective outreach 	PM MEL ESS	Throughout project	Policy frameworks are equitable, inclusive, and socially sensitive; broad stakeholder acceptance	Included under advocacy works budget.

		<ul style="list-style-type: none"> - Apply CARM as grievance mechanism - Conduct safeguarding risk assessment - Deliver safeguarding sensitization/training using Mercy Corps's modules 				
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Climate Resilient Livelihood Business Models Operationalized						
Summary of risks	Risk	Mitigation measures	Responsible party/person	Schedule	Expected results	Cost/Budget
<ul style="list-style-type: none"> - Activity 11.1 Development of bundled service business model for selected aquaculture and agriculture commodities (grouper, milkfish, coffee and carrot) - Activity 11.2 Engage groups linking farmers, financial actors, and technical service providers to foster adoption of business model 						
Low adoption of business models by farmers and aquaculture groups	Low	<ul style="list-style-type: none"> - Provide training and capacity-building workshops. - Demonstrate pilot models with technical support. - Offer bundled services linking input providers, technical support, and financing. - Conduct regular follow-up and mentoring. 	Project Coordinator MSD Officer Livelihood Specialist	Training, pilot demonstration (Year 2-Year 5) Mentoring mainly in Year 2-Year 3	Increased adoption and use of climate-resilient livelihood models.	Included under business model development budget.
Exclusion of women, youth, or vulnerable groups from business model benefits	Low	<ul style="list-style-type: none"> - Ensure participatory design of business models. - Include women, youth, and marginalized groups in planning and implementation. - Value-added scheme activity designed specifically to involve women group - Conduct gender and social assessments before scaling models. - Implement GAP. 	MEL MSD Officer Livelihood specialist	Business model design and stakeholder engagement mainly in year 2 and 3	Equitable access to benefits; inclusive participation of all target groups.	Included under consultations, workshops, business model development budget.

		<ul style="list-style-type: none"> - Apply CARM as grievance redress mechanism for any exclusion issues. - Conduct safeguarding risk assessment - Deliver safeguarding sensitization/training using Mercy Corps's modules 				
Market or financial risk impacting viability	Low	<ul style="list-style-type: none"> - Facilitate linkages with financial institutions, offtakers, and insurance providers. - Provide technical advisory services for market access. - Develop risk mitigation strategies for price fluctuation and climate impacts. 	PM MSD Officer	Market linkage and advisory phase mainly in Year 2- Year 3-	<p>Reduced financial and market risks.</p> <p>Improved business viability.</p>	Included under market access and advisory services budget.
Unsustainable practices affecting natural resources and/or other safeguards triggered from company operations	Low	<ul style="list-style-type: none"> - Abide by MCI policies on private sector engagement. - Embed climate-resilient practices in business models. - Include guidelines for sustainable agriculture and aquaculture practices. - Monitor environmental indicators (soil health, water quality, biodiversity). 	PM Livelihood specialist	Throughout project implementation.	<p>Engage companies with high social and environmental standards</p> <p>Sustainable practices maintained.</p> <p>Minimized environmental impact. No safeguards contravened.</p>	Included under market access. PSE workshop budget
Knowledge gaps hindering replication and scaling	Low	<ul style="list-style-type: none"> - Document lessons learned and best practices. - Conduct workshops and knowledge-sharing events. 	Project Coordinator	Documentation and scaling phase (year 3-5).	Lessons learned captured.	Included under media outreach, knowledge management, workshop budget

		- Develop manuals and toolkits for replication in other areas.	Livelihood specialist		Business models replicated successfully in other areas.	
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Inclusive, Climate Resilient Market Systems Established						
Summary of risks	Risk	Mitigation measures	Responsible person	Schedule	Expected results	Cost/Budget
<ul style="list-style-type: none"> - Activity 12.1 Facilitate linkage with financial institutions (banks, microfinance, insurance) - Activity 12.2 Provision of technical advisory services 						
Limited access to finance and insurance for smallholder farmers or fish farmers	Low	<ul style="list-style-type: none"> - Facilitate linkages with financial institutions, microfinance, and insurance providers. - Provide guidance on credit and insurance options. - Support financial literacy and capacity-building workshops. 	MSD Officer	Finance linkage and training undertaken start from end of Year 2	Increased access to financial and insurance services.	Included under finance and training budget
Inability to develop or operationalize financial products in partnership with banks	Low	<ul style="list-style-type: none"> - Early engagement with financial institutions to identify or co-design appropriate products that are accessible for the communities, including gender and vulnerable groups. - Conduct feasibility studies to assess bank appetite and regulatory compliance. - 	Project Coordinator MSD Officer	Pilot and design in early years.	Financial products successfully developed and ready for scale-up.	Included under finance and training budget
Market instability, including potential conflict from market disruption and the presence of new market actors in the current	Low	<ul style="list-style-type: none"> - Conduct market chain analysis and market system development to identify opportunities and risks 	MSD Officer Livelihood specialist	Market assessment and linkage in second year.	Reduced market risks. Sustainable adoption of climate-resilient	Included under market assessment budget.

market networks, affecting adoption and sustainability		<ul style="list-style-type: none"> - Assessing potential and feasible business model that will not create (or minimize) sudden disruption to the existing market. - Link farmers and fishers with reliable offtakers. - Encourage value-added production and diversification. 			practices and the corresponding business model.	
Exclusion of vulnerable groups (women, youth, marginalized farmers) from market access	Low	<ul style="list-style-type: none"> - Ensure participatory market engagement and stakeholder mapping. - Include vulnerable groups in training, networking, and market linkages. - Apply CARM as grievance redress mechanism for any exclusion issues. - Conduct safeguarding risk assessment - Deliver safeguarding sensitization/training using Mercy Corps's modules 	MEL MSD Officer	Market linkage and stakeholder engagement in year 2 and 3.	Equitable access to market opportunities for all target groups.	Included under market linkage, business model development budget.
Resistance in using new financial products due to unfamiliarity with the schemes.	Low	<ul style="list-style-type: none"> - Conduct awareness campaigns and training on new financial products. - Provide guidance and mentorship on usage. 	MSD Officer	Training and awareness (Year 3-Year 4).	Increased adoption and confidence in new financial products.	Included under consultation, training, workshop budget.
Local FIs financing nature-positive business cases may inadvertently fund companies or projects that fail to properly balance nature-positive approaches with sustainable practices	Low	<ul style="list-style-type: none"> - Prioritise financial institutions who have worked with MCI in Indonesia - For other banks ensure they meet MCI requirements for corporate engagement. - Develop guidelines and advisory support for financial institutions. 	PM MSD Officer Livelihood specialist	Screening and advisory (Year 1-Year 2)	Ensured environmentally responsible financing.	Included under consultation, training, workshop budget.

Sexual Exploitation, Abuse, and Harassment

Summary of risks	Risk	Mitigation measures	Responsible person	Schedule	Expected results	Cost/Budget

Risk of Sexual Exploitation, Abuse, and Harassment (SEAH) during community consultations, trainings, field activities, and interactions between project staff, contractors, and community members, particularly affecting women, youth, and vulnerable groups.	Low	<p>Enforce Code of Conduct with SEAH provisions for all project staff, partners, and contractors.</p> <p>Include SEAH clauses in contracts and partnership agreements.</p> <p>Conduct mandatory SEAH awareness and safeguarding training for project workers.</p> <p>Ensure confidential reporting through CARM grievance mechanism.</p> <p>In alignment with the Gender Action Plan to ensure gender responsive project implementation and monitoring</p> <p>Apply confidential response and referral procedures if incidents occurs.</p> <p>ESS Specialist</p> <p>We will use the GCF's <u>Sexual Exploitation, Abuse and Harassment (SEAH) risk assessment guideline Green Climate Fund</u></p> <p>The process of risk screening will be led by the MEL Officer and will be reviewed by the ESS specialists and senior project management team</p>	MEL and ESS Specialist	Throughout project	SEAH safeguards implemented; staff trained; reporting mechanism accessible and functional.	Included in budget
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Chapter 5: Environmental and Social Assessment of Blue-Green Space Interventions

During the implementation phase the project will determine and introduce the on the ground activities for blue-green space. Depending on the activities chosen, this could trigger environmental and social safeguards. It is therefore necessary that all blue-green space options are carefully screened for environmental and social risks, and only those that fall under Category C will be implemented. Annex 2 provides a screening template and exclusion list. This approach ensures that the blue-green space will not involve hard structures and that any risks remain minimal, localized, and readily mitigated. Potential risks will be closely monitored (see Annex 3), and, if necessary, site-specific Environmental, Social, and OHS Codes of Practice (ESCOPs) will be developed to guide implementation. In addition, Annex 4 provides a SEAH screening template, to ensure basic risk mitigation measures are in place ahead of stakeholder engagement. The MEL Officer will conduct risk screening during project design and before construction to guarantee that only low-risk options are pursued, avoiding hard structures and higher-risk activities. The purpose of the screening is to understand whether a activity might give rise to negative social and environmental impacts and - if risks have been identified - to determine the need for conducting further assessments for better understanding of the risks. The risk screening will be done for each activity once the main details of the intervention are agreed. The process of risk screening will be led by the MEL Officer and will be reviewed by the ESS specialists and senior project management team, with the Project Manager/Executive Director having overall responsibility. Through this process, the project will maintain compliance with environmental and social safeguards Category C, while ensuring that localized risks are minimized with cost-effective mitigation measures. Given the small- scale and low impact nature of the sub-projects, it is not likely that third parties will be required to carry out assessment or develop stand-alone mitigation documents. The associated costs have been integrated into the project budget for the assessment of the blue-green space.

To ensure that blue-green space interventions remain within the low-risk Category C threshold, Mercy Corps Indonesia will apply its institutional safeguard tools as part of the assessment and mitigation process. This includes conducting Safeguarding Risk Assessments to identify potential social risks such as exclusion, conflict, or ethical violations, and delivering Safeguarding Sensitization and Training for staff and local stakeholders to strengthen awareness of protection principles. Additionally, Environmental, Social, and Occupational Health & Safety Codes of Practice (ESCOPs) will be developed for specific intervention sites with potential technical or social risks. The Community Accountability Reporting Mechanism (CARM) will be activated and communicated to communities from the planning stage, ensuring an adaptive and participatory risk management approach.

Chapter 6: Monitoring and Supervision

The purpose of E&S monitoring is to verify that the E&S risk management measures established in the ESAP are being implemented and to judge whether the individual measures are effective in mitigating the respective risks. Important features of project design that respond to risks as well as application of the various safeguards instruments and tools will be closely monitored. The MEL Officer will lead on overall monitoring of the ESAP. The Project Manager has overall responsibility to ensure this is carried out in a proper manner.

This will also require monitoring and supervision of the blue-green space projects. As described above any identified mitigation measures will be specified in the sub-project's simplified ES management plan (Annex 2). A template for monitoring and reporting progress of implementing the mitigation measures is shown in Annex 3. The E&S progress reports are to be completed by the project's MEL Officer and will be reviewed as part of the annual

supervision mission by MCI. Aside from reviewing implementation progress this step will also involve checking the effectiveness of measures in mitigating risks and screening for additional risks that may have emerged since the sub project started and whether it has responded with adaptive management. Depending on the risk issues and their significance, the supervision mission might also include consultation with stakeholders and affected groups to gather feedback on the effectiveness of measures.

The project will integrate monitoring of SEAH risks within the overall Environmental and Social safeguards and MEL system. Responsibility for monitoring SEAH risks will be assigned to the MEL Lead, in coordination with Mercy Corps Indonesia's Community Accountability Reporting Mechanism (CARM) contacts. Project staff, partners, and contractors will receive SEAH awareness and safeguarding training and will be required to comply with the project's Code of Conduct.

Monitoring of SEAH mitigation measures will be conducted through regular safeguards monitoring, activity supervision, and review of grievance records. Standard monitoring templates used within the ESAP and MEL system will track the implementation of mitigation measures, including staff training, Code of Conduct compliance, and communication of reporting channels. SEAH related complaints may be reported through the CARM grievance mechanism, which provides confidential and accessible channels for community members and project stakeholders. Given the sensitive nature of SEAH cases, all reports will be handled with strict confidentiality, and ethical documentation, ensuring personal data protection and non-retaliation. Where necessary, affected individuals will be referred to appropriate local support services in line with safeguarding procedures. Feedback will be provided to complainants through the grievance mechanism while protecting confidentiality. Information on the implementation of SEAH mitigation measures and any related incidents will be summarized in the project's Annual Performance Reports, while maintaining confidentiality of sensitive information. This system ensures continuous monitoring, accountability, and safe reporting throughout project implementation.

Chapter 7: Grievance Redress Mechanism (GRM) and Stakeholder Engagement Plan (SEP)

Stakeholder engagement and grievance management are integral components of the Environmental and Social Management approach for the project. A comprehensive Stakeholder Engagement Plan (SEP) and Grievance Redress Mechanism (GRM) have been developed as stand alone annexes and form part of the overall Environmental and Social Management framework. A summary is provided below.

Stakeholder Engagement Plan

The project has undertaken extensive stakeholder engagement during the design phase, including interviews, bilateral consultations, and focus group discussions supporting the gender assessment, market value chain analysis, environmental and social planning, and blue-green space pre feasibility assessments. These consultations identified key issues including access to information and technology, inclusive participation, knowledge and capacity constraints, financial and economic challenges, long-term sustainability, and health and disease concerns.

During implementation, stakeholder engagement will continue in accordance with the Stakeholder Engagement Plan (SEP), which defines stakeholder roles and responsibilities, communication mechanisms, consultation schedules, and inclusion measures for vulnerable and marginalized groups, including women, female-headed households, local communities, and other at-risk populations. The SEP also includes provisions for annual review and updating to ensure responsiveness to stakeholder feedback and changing project conditions. Monitoring of stakeholder engagement activities will be integrated into the project Monitoring and Evaluation framework at inception, mid-term, and final evaluation stages.

Further details on stakeholder identification, engagement strategies, consultation methods, and monitoring arrangements are provided in Annex 14.

Grievance Redress Mechanism (GRM)

A project-level Grievance Redress Mechanism (GRM) will be implemented to provide affected communities and stakeholders with accessible channels to raise concerns or complaints related to environmental, social, or operational aspects of the project. The GRM will be implemented in alignment with the existing Community Accountability Reporting Mechanism (CARM) established by MCI, which is designed to ensure accountability to affected populations and prevent exploitation, abuse, and misconduct. The project will allocate dedicated resources to support the effective operation of the GRM, including designated staff responsible for grievance intake, documentation, response, and resolution. Operational procedures will be established to ensure grievances are addressed in a timely, transparent, and confidential manner. Stakeholders will also retain the right to access external grievance mechanisms, including the GCF Independent Redress Mechanism (IRM), in accordance with GCF policies.

Further details on grievance procedures, reporting channels, response timelines, and escalation processes are provided in Annex 14.

Chapter 8: Institutional Arrangements

The following table establishes the responsibilities for monitoring E&S risks and the ESAP, including projects under the blue-green space. Costs are already budgeted elsewhere in the project.

ESMS steps	Responsible entity	Involved entity	Guidance
Safeguards training for projects staff and stakeholders	ESS Specialist	MCI Safeguards Specialist	Safeguard training modules
Continuous Stakeholder Engagement as specified in the Stakeholder Engagement Plan	Advocacy focal point, Project Coordinator	Project Manager	Stakeholder Engagement Plan,
E&S screening for blue-green space interventions	MEL ESS Specialist	Project Manager	Template in Annex 2.
ESMS Clearance	Project Manager	Approved by MCI Executive Director	
ESMP implementation and monitoring of sub projects	ESS Specialist MEL	Project Manager, MEL manager	Template in Annex 3.
Company/bank due diligence assessment	MSD Officer Project coordinator	Approval by Project Manager	MCI DD policy for companies.

SEAH safeguards will be implemented through the project's institutional structure under the oversight of the Project Management and Implementation Unit. Kemitraan's Environmental and Social Safeguards Specialist will lead the implementation and oversight of SEAH risk management measures, ensuring alignment with project safeguard requirements and institutional policies. The MCI Monitoring, Evaluation and Learning (MEL) Lead will support the monitoring of SEAH risks, ensuring implementation of the Code of Conduct, tracking mitigation measures, and integrating SEAH indicators into the project monitoring framework, in close coordination and engagement with the ESS Specialist throughout the process.

SEAH-related grievances will be received through Mercy Corps Indonesia's Community Accountability Reporting Mechanism (CARM), which will handle complaints in a confidential, survivor centered manner. The CARM team will coordinate closely with Kemitraan's Environmental

and Social Safeguards Specialist, the Safeguards Focal Point, and project management to assess reported cases, facilitate appropriate response measures, and ensure timely and appropriate follow-up. Updates on SEAH risk mitigation, capacity-building activities, and grievance management will be included in project monitoring reports and Annual Performance Reports submitted to the Green Climate Fund, while maintaining strict confidentiality and adherence to survivor protection principles.

Annex 1: Environmental and Social Screening Checklist¹

Part A: Risk Factors

Please indicate your answers to the questions below and provide an explanation on the response selected. In cases when the TBD response has been selected please explain briefly why you are not able to determine now and when in the project cycle the question will be addressed.

If the criteria is not applicable to the project you may write N/A in the justification box.

Risk Factors	YES	NO
Will the activities involve associated facilities and require further due diligence of such associated facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Please provide a justification of your answer:</i> <i>Activities under the project are heavily focusing on livelihood-related activities, so that it will not involve such associated facilities. The development of blue-green space also will not require the construction of associated facilities, as its location and design will be ensured as will not require the addition of such facilities.</i>		
Will the activities involve trans-boundary impacts including those that would require further due diligence and notification to affected states?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Please provide a justification of your answer:</i> <i>The project will not create potential transboundary impact. The potential impacts (identified) are mostly local and can be easily mitigated.</i>		
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 checked="" type="checkbox"/>
<i>Please provide a justification of your answer:</i> <i>Potential impact on working conditions and health and safety of workers might occur in blue green space activity. However our initial assessment on the impact (refer to Annex 5) sees the impact as minimal, localized, and can be easily mitigated. As part of the Project Preparation Facility for the full proposal development, an Environmental and Social Action Plan will be developed, where the ESAP will develop detailed mitigation measures for the impact.</i>		
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 checked="" type="checkbox"/>
<i>Please provide a justification of your answer:</i> <i>The climate-smart agriculture activities conducted in upstream and midstream will use organic fertilizer, so that the potential of soil, water and land contamination from hazardous waste and pollutant can be avoided.</i>		
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 checked="" type="checkbox"/>
<i>Please provide a justification of your answer:</i> <i>No critical infrastructure involved in the project</i>		
Will the proposed activities potentially involve resettlement and dispossession, land acquisition, and economic displacement of persons and communities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Please provide a justification of your answer:</i> <i>Activities under the project will not causing nor resulting in involve resettlement and dispossession, land acquisition, and economic displacement of persons and communities</i>		
Will the activities be located in or in the vicinity of protected areas and areas of ecological significance including critical habitats, key	<input checked="" type="checkbox"/>	<input type="checkbox"/>

¹ In answering this checklist, you may refer to Annex 1: Guidance on Part A ESS Screening of the [“Guidelines for the environmental and social screening of activities proposed under the SAP”](#)

biodiversity areas and internationally recognized conservation sites?		
Please provide a justification of your answer: <i>The targeted intervention area for climate-smart agriculture activities located in the same sub-district (the Petungkriyono sub-district) as the Essential Ecosystem Region (EER). Considering the conservation-based principle that the project will apply under the agriculture-related intervention, thus the project activities can be ensured as will not negatively affect the EER area and its surroundings; instead it will support the ecosystem conservation activities in the area by preventing land degradation from unsustainable agriculture practice. Further, the current ZFRA's resilient livelihood activity is also located in the surrounding area, and the activity was acknowledged by the local government as supporting the EER preservation.</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 checked="" type="checkbox"/>
Please provide a justification of your answer: Indigenous people is not resided in the Petanglong area and its surroundings.		
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 checked="" type="checkbox"/>	<input type="checkbox"/>
Please provide a justification of your answer: <i>In 2009, UNESCO designated batik as an intangible cultural asset of Indonesia. Specifically, Pekalongan City holds the distinction of being the heritage city for Batik, with UNESCO granting it the title of World Creative City in 2014. Consequently, our project will be situated in areas of cultural significance. Nevertheless, as our project will not involve any batik-related activities, and given that the cultural value associated with batik is intangible in nature, it will not have any adverse effects on this cultural heritage.</i>		

Part B: Specific Environmental and Social Risks and Impacts

Assessment and Management of Environmental and Social Risks and Impacts	YES	NO	TBD
Has the E&S risk category of the project been provided in the concept note?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Has the rationale for the categorization of the project been provided in the relevant sections of the concept note?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Are there any additional environmental, health and safety requirements under the national laws and regulations and relevant international treaties and agreements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Please provide a justification of your answer: <i>The project implementer will adhere to Ministry of Environment Regulation No. 5 Year 2012 (PermenLH 5/2012) when designing project activities, including technical aspects. This regulation not only provides a comprehensive list of activities necessitating Environmental Impact Assessments but also delineates the environmental document screening process applicable to projects in Indonesia, including those falling under the scope of the BRAVE project. By strictly following this regulation, we can guarantee that the BRAVE project's activities and technical design will not necessitate any additional environmental documentation submission for the project implementation.</i>			
Are the identification of risks and impacts based on recent or up-to-date information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Please provide a justification of your answer: <i>Risks and impacts were assessed by considering the current condition and dynamics in the field (and at national level), both in terms of institutional state and technical condition. The assessment had also considered the applicable regulations at local, provincial, national and global policies.</i>			

Labour and Working Conditions	YES	NO	TBD
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i> Aquaculture and agriculture activities are embedded with gender inequality, typically with a predominant role held by the male family member of the family. This gender imbalance <i>could potentially lead to beneficiaries selection process that follow this path, leading to unequal benefit between gender groups.</i> However, during full proposal development, as part of Project Preparation Facility, <i>we will conduct a thorough gender assessment and formulate the corresponding gender action plan.</i> The outcomes of these assessments will be integrated into the project design. This approach is <i>essential to mitigate any risks associated with unequal opportunities and ensure a fair distribution of benefits.</i>			
Will the activities pose occupational health and safety risks to workers including supply chain workers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i> During the process of blue-green space, the <i>workers might be exposed to safety and health risks.</i> However due to the character of the space that is not a hard structure, we see <i>the risks as minimal, localized, and can be easily mitigated.</i> As part of the Project Preparation Facility for the full proposal development, an Environmental and Social Action Plan will be developed, where the ESAP will develop detailed mitigation measures for the risks.			
Resource Efficiency and Pollution Prevention	YES	NO	TBD
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i> <ul style="list-style-type: none"> Aquaculture and agriculture activities have the potential to causing water pollution from the outflow of sediment, nutrient and food substrate from the implementation site to the nearest water body. The establishment of blue-green space (land preparation part) also has the potential to resulting in water pollution from sediment transportation to water body. 			
Will the activities utilize significant amount of natural resources including water and energy?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i> The project <i>promotes better water resource management along the watershed</i>			
Will there be a need to develop detailed measures to reduce pollution and promote sustainable use of resources?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i> No, since the <i>detailed measures for any potential pollution risks will be outlined in the Environmental and Social Action Plan</i> which developed as part of the Project Preparation Facility during the full proposal development stage. A comprehensive environmental and social safeguarding process will be carried out as part of the Environmental and Social Action Plan development in the full funding proposal development stage.			
Community Health, Safety, and Security	YES	NO	TBD
Will the activities potentially generate risks and impacts to the health and safety of the affected communities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i> The project <i>will not create negative risks and impacts to the health and safety of the communities resided within the intervention area and the surroundings, instead it will improve them from better flood management (reduce the potential for water-borne disease due to flood event)</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 checked="" type="checkbox"/>	<input type="checkbox"/>

<p>Please provide a justification of your answer:</p> <p>No additional emergency preparedness and response plan is needed since BRAVE has already incorporated the creation of such a plan into our project activities.</p> <p>Alongside the establishment of blue-green space within the BRAVE project, there will be concurrent efforts to develop a flood early warning system and flood contingency plan. This contingency plan encompasses emergency preparedness and response plan, and will be prepared for for sub-districts where the blue-green space located and their downstream sub-districts.</p>			
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 checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Please provide a justification of your answer:</p> <p>Kemitraan as the DAE has a robust and comprehensive Social Safeguard Policy which comprises of five different policies, namely: a) Gender Policy, b) Indigenous People Policy, c) Environment and Social Safeguard, d) Child Protection Policy, and e) Discrimination, Harassment, Exploitation and Abuse Policy.</p> <p>MCI as the EE also has a strong policy on sexual harrasment and inappropriate behaviour. MCI's Code of Conduct details the standards of behavior and conduct expected from the team members. MCI's Sexual Exploitation and Abuse Policy; Child Safeguarding Policy; Ethics Compliant and Whistleblower Policy; covers sexual exploitation, harassment, soliciting sexual activity, child abuse and act/threat of physical violence by staff or partner.</p> <p>The project will be ensured to always adhere to the aforementioned policies and thus will not pose negative impacts to the safety/security of involved actors and the surrounding community.</p>			
Land Acquisition and Involuntary Resettlement	YES	NO	TBD
Will the activities likely involve land adquisition and/or physical or economic displacement?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Please provide a justification of your answer:</p> <p>Upon discussion with the local government, it has been agreed that the project will not involve land acquisition and involuntary resettlement. Blue-green space will be situated in government land; while for the livelihood activities, the land will be those owned by the community or the government. For activities to be done in government land, a cooperation agreement will be made to ensure no future conflict will arise from the utilization.</p>			
Biodiversity Conservation and Sustainable Management of Living Natural Resources	YES	NO	TBD
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"/>	<input type="checkbox"/>
<p>Please provide a justification of your answer:</p> <p>The project will not introduce invasive species of flora and fauna. Agriculture and aquaculture commodities that will be the focus of the project will be those that have already been cultivated by the farmers and fishfarmers, so that there will be no introduction of invasive species nor new commodities. Our project will be focusing more on empowering the farmers to exercise climate-smart agriculture and adaptive aquaculture method. Further, vegetation that will be used for conservation purposes will also be those that have been historically planted in the area, so that those vegetation will not have any difficulty to grow in the area.</p>			
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Please provide a justification of your answer:</p> <p>Yes in a positive way. The project's primary focus on climate-resilient agriculture and adaptive aquaculture does indeed have potential positive impacts on and dependencies on ecosystem services. By implementing climate-resilient agriculture and adaptive aquaculture method, the BRAVE project aims to enhance the productivity and sustainability of these sectors. The project activities will thus directly influence the production of living natural resources, such as agriculture, fisheries, and forestry. Vice versa, the project's success may also depend on the availability and health of these ecosystem services, as they play a fundamental role in supporting the project overall objective of building flood resilient community through adaptive livelihood. Hence as part of our livelihood activities, we embed conservation principle within.</p>			
Indigenous Peoples	YES	NO	TBD

Will the activities potentially have any indirect impacts on indigenous peoples, ethnic minorities, or vulnerable and marginalized groups?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Please provide a justification of your answer: Indigenous community and ethnic minorities were not identified in the Petanglong area, so that the program will not pose direct and indirect negative impact to the particular communities. As for vulnerable groups, instead of negative impact, the project will instead positively affect the poor population resided in the Petanglong area through the provision of better water resource management and improved socio-economic capacity.			
Cultural Heritage	Yes	NO	TBD
Will the activities restrict access to the cultural heritage sites and properties?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Please provide a justification of your answer: No cultural heritage sites can be identified in the proposed target area, so that the activities will not restrict access to cultural heritage sites and properties.			
Will there be a need to prepare a chance-find procedure in case of the discovery of cultural heritage assets?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Please provide a justification of your answer: Upon discussion with the local government and desk study on potential cultural heritage asset (site) in the area, there is no need to prepare a chance-find procedure.			
Stakeholder engagement and grievance	Yes	NO	TBD
Will the activities include a continuing stakeholder engagement process and a grievance redress mechanism and integrated into the management/implementation plans?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Please provide a justification of your answer: <ul style="list-style-type: none"> One of the project outcome is 'Enabling environment to replicate and scale-up climate-resilient IWRM exists', where active stakeholder engagement is critical to achieve the outcome. Accordingly, multi-level advocacy process that involve multi-stakeholder engagement are among activities to be implemented under the project. Meanwhile for grievance redress, a grievance mechanism will be a part of the project's Environmental and Social Action Plan (ESAP) and will be included in the project implementation plan. Further, the project will also apply MCI's CARM as part of the grievance mechanism. Grievance mechanism will be implemented and communicated to the stakeholders starting from project commencement and continue throughout the project period (CARM form will be shared in every project event/meeting) to ensure an adaptive management to improve program quality can be done. 			

Annex 2: E&S Screening Template

Sub-project Information	
Outputs:	
Main activities:	
Location:	
Executing Entity:	
Date of screening:	
Screened by:	
Decision	

ESMS Screening Summary report	Rating of environmental and social risks (Refer to table 1 below)			Rationale for risk Category
Environmental and Social Risk Areas (B1-B7) & Standards (C1-C4)	Likelihood (1-5)	Impact (1-5)	Category	Description
B1: Adverse gender-related impacts				
B2: Risks of affecting vulnerable groups				
B3: Risk of undermining human rights				
B4: Community health, safety and security risks				
B5: Labour and working conditions				
B6: Resource efficiency, pollution, wastes, chemicals and GHG emissions				
B7: Risk of climate change				
C1: Standard on Involuntary Resettlement and Access Restrictions				
C2: Standard on Indigenous Peoples (PS7)				
C3: Standard on Cultural Heritage				
C4: Standard on Biodiversity Conservation and Sustainable Use of Natural Resources				

Risk Areas Standards/	Possible risks	Yes/ No	Mitigation Measures
Adverse gender-related impacts)	<ul style="list-style-type: none"> Is there a risk that the sub-project may discriminate against women or other groups in access to resources, services, or benefits? Could the sub-project unintentionally worsen or perpetuate gender inequalities, impacting women and girls? Might the sub-project restrict women's ability to use, develop, or protect natural resources, considering gender roles in access to environmental goods and services? Is there a risk that the sub-project could contribute to gender-based violence (including harassment, exploitation, or abuse)? Have such incidents been reported in the past related to the sub-project or its activities? 		
Risks of affecting vulnerable groups	<ul style="list-style-type: none"> Has the sub-project site been assessed for the presence of vulnerable or disadvantaged groups (including persons with disabilities)? Are their livelihood conditions and needs sufficiently understood? Please identify the groups considered in the analysis. Is there a likelihood that sub-project risks and negative impacts will disproportionately affect disadvantaged or vulnerable individuals or groups, including changes in land use or tenure that may impact them? Is there a risk that the sub-project may discriminate against vulnerable groups in access to resources, services, or benefits provided by the sub-project? 		
Risk of undermining human rights	<ul style="list-style-type: none"> Could the sub-project impact human rights (civil, political, economic, social, or cultural) by reducing rights protection or weakening respect for rights? Is there a risk that sub-project activities may affect individuals' ability to meet basic needs, particularly for vulnerable groups, including persons with disabilities? Could sub-project activities limit individuals' participation in decision-making or access to important information? Is there a risk of preferential treatment in resource or service access, leading to discrimination or exclusion of vulnerable groups? Could the sub-project contribute to discrimination based on ethnicity, sex, age, disability, sexual orientation, religion, or other factors? Is there a history of human rights issues in the sub-project area, and could the sub-project aggravate these situations? 		
Community health, safety and security risks	<ul style="list-style-type: none"> Is there a risk of increasing community exposure to security and safety risks, especially for vulnerable groups, in conflict or post-conflict areas or regions affected by organized crime or illegal activities? Could the sub-project inadvertently worsen or generate conflicts within or between communities, including through weakened institutions or escalating tensions? Will the sub-project support law enforcement activities (e.g., in a protected area)? Is there a risk of injury or loss of life due to human-wildlife conflicts triggered by sub-project activities, particularly affecting vulnerable groups? Is there a risk that the sub-project could affect ecosystem services and increase community exposure to natural hazards or disasters, particularly with the impacts of climate change? Could sub-project activities lead to accidents or exposure to hazardous substances, including from vehicles, equipment, or infrastructure, especially in areas prone to natural hazards? 		

	<ul style="list-style-type: none"> • Could the sub-project cause health and safety risks, such as waterborne diseases, vector-borne infections, poor air quality, or inadequate disease prevention measures? 		
Labour and working conditions	<ul style="list-style-type: none"> • Is there a risk that sub-project workers may face working conditions that don't meet national labor laws or International Labor Organization standards (e.g., discrimination, lack of equal opportunity, unclear employment terms, harassment, or lack of freedom of association)? • Will the sub-project engage local volunteers or individuals in community work programs? If so, for what activities, and is there a risk that working conditions may not meet labor standards? • Are sub-project workers (including rangers and community patrols) exposed to violence or security risks during their duties (e.g., human-wildlife conflict, armed poachers, or criminal groups)? • Is there a risk that sub-project workers may face occupational health and safety (OHS) risks, including hazardous conditions related to vehicles, equipment, machinery, diseases, or specific threats to women? • Is there a risk of forced labor or harmful child labor in the project, either directly or indirectly, affecting workers or stakeholders like farmers or other beneficiaries? 		
Indigenous Peoples (PS7)	<ul style="list-style-type: none"> • Are Indigenous Peoples present in, or have collective attachment to, the project area? • Could the sub-project affect Indigenous Peoples' lands, territories, or natural resources traditionally used or occupied? • Could the sub-project affect Indigenous Peoples' cultural heritage, traditional knowledge, or customary governance systems? • Could the sub-project restrict Indigenous Peoples' access to natural resources or livelihoods? • Would project activities require Free, Prior and Informed Consent (FPIC) under the GCF ESS or IFC Performance Standard 7? 		
Resource efficiency, pollution, wastes, chemicals and GHG emissions (also related to land restoration opportunities)	<ul style="list-style-type: none"> • Is there a risk that sub-project activities could release pollutants (chemicals, hazardous materials) into the environment, either accidentally or during routine operations, with potential local, regional, or transboundary impacts? • Is there a risk that sub-project activities could generate significant waste, wastewater, or hazardous waste, and lead to improper disposal? • Will the sub-project use chemicals or hazardous materials? If yes, how are risks managed, and do any substances fall under international bans or restrictions due to toxicity or environmental harm? • Will the sub-project involve significant consumption of energy, water, or other resources? If so, how will resource efficiency be ensured? • Will the sub-project lead to significant greenhouse gas emissions or reduce carbon pools (e.g., through loss of vegetation)? 		
Risk of climate change	<ul style="list-style-type: none"> • Has climate variability and change been analyzed in the sub-project area? • Will climate change impacts affect livelihoods, particularly for vulnerable groups (e.g., women or marginalized communities)? Does the sub-project address these risks? • Could the sub-project increase the vulnerability of local communities to climate hazards (e.g., floods, droughts)? How will this risk be managed? • Could the sub-project increase the vulnerability of the local ecosystem to climate hazards? How will this risk be managed? 		

Standard on Involuntary Resettlement and Access Restrictions	<ul style="list-style-type: none"> • Will the sub-project involve involuntary resettlement or land acquisition (e.g., for creating a nature reserve or reducing wildlife-related threats)? • Is there a risk of forced eviction due to sub-project activities? • Could the sub-project cause economic displacement by restricting access to land or natural resources? (e.g., through establishing or extending protected areas, enforcing regulations, building barriers, or changing resource management systems). 		
Standard on Cultural Heritage	<ul style="list-style-type: none"> • Is the sub-project located near a designated or proposed cultural heritage site (e.g., UNESCO World Heritage Sites)? • Does the sub-project site contain cultural resources (e.g., burial sites, monuments, buildings with historical or religious significance)? • Does the sub-project area contain natural features with cultural, spiritual, or symbolic significance (e.g., sacred sites)? • Will the sub-project restrict access to cultural or sacred sites for local communities? • Is there a risk that the sub-project could affect intangible cultural resources such as traditions, knowledge, or customs, or neglect customary management? • Will the sub-project promote the use of cultural heritage or natural sites with cultural significance for economic benefits? Is there a risk that local communities may lose control or that benefits may not be shared equally? 		
Standard on Biodiversity Conservation and Sustainable Use of Natural Resources	<ul style="list-style-type: none"> • Is the sub-project located near legally protected or high biodiversity areas (e.g., reserves, UNESCO sites, or areas recognized by indigenous peoples)? • Could the project impact biodiversity in these areas through activities like infrastructure or ecotourism? • Could the sub-project impact biodiversity outside protected areas, such as through infrastructure or vegetation removal? • Could the project impact biodiversity outside the project area (e.g., through sourcing materials like timber)? • Will the sub-project introduce non-native species? How will risks of invasiveness be managed? • Could the sub-project create pathways for spreading invasive species? • Could the sub-project impact water flows or hydrology (e.g., through extraction or diversion)? • Could the sub-project affect water quality (e.g., contamination or salinity changes)? • Will the sub-project use pesticides or herbicides? • Will the sub-project use genetically modified organisms? • Will the sub-project use genetic resources from natural habitats? How will sustainability and benefit-sharing be ensured? • Could the sub-project lead to migration or population growth, straining resources? • Could the sub-project cause noise or vibration that disturbs wildlife? 		

Annex 2B – Exclusion List

As a supplementary safeguard mechanism, this Exclusion List applies to all sub-project activities under the BRAVE project (CSA, aquaculture, and blue–green spaces). Any proposed activity falling within this list will be deemed ineligible for support. The purpose of this list is to ensure that no activity elevates the project’s environmental and social risk category beyond Category C under the GCF Revised Environmental and Social Policy.

1. Land and resettlement

The project will not support:

- Activities involving land acquisition.
- Physical displacement (relocation of households or structures).
- Economic displacement, including restriction of access to land, water, fisheries, forests, or other livelihood resources.
- Activities on land subject to disputes, encumbrances, informal settlers, or unresolved tenure claims.
- Activities that alter customary land rights or access arrangements.

2. Biodiversity and natural habitats

The project will not support:

- Activities located within legally designated protected areas, critical habitats, or internationally recognized conservation sites.
- Activities requiring habitat conversion, deforestation, or clearing of natural vegetation beyond minor trimming.
- Introduction of invasive or non-native species.
- Activities that significantly alter hydrological regimes (e.g., river diversion, permanent water impoundment, wetland drainage).
- Sourcing of materials that may contribute to illegal logging or biodiversity loss.

3. Infrastructure and construction

The project will not support:

- Permanent hydraulic structures (e.g., dams, concrete embankments, engineered impoundments).
- Deep excavation beyond minor reshaping for landscaping purposes.
- Large scale earthworks or soil removal.
- Construction requiring heavy machinery deployment beyond small-scale tools.
- Infrastructure that could create significant community safety risks (e.g., deep open water bodies).

4. Labor and human rights

The project will not support:

- Production or activities involving harmful or exploitative forms of forced labor.
- Harmful child labor as defined by national law and ILO conventions.
- Activities that violate national labor laws or international human rights conventions.
- Activities involving discrimination, harassment, or exploitation of vulnerable groups.

5. Pollution, hazardous materials, and prohibited products

The project will not support:

- Production or trade in any product or activity deemed illegal under host country laws or regulations.
- Production or trade in products subject to international bans or phase-outs, including:
 - ✓ Ozone-depleting substances
 - ✓ Polychlorinated biphenyls

- ✓ Persistent organic pollutants
- ✓ Wildlife or wildlife products regulated under CITES
- ✓ Banned pesticides or herbicides
- Activities involving significant generation of hazardous waste.
- Introduction of genetically modified organisms.
- Use of internationally prohibited agrochemicals.

6. Associated Facilities

In accordance with the GCF RESP definition, associated facilities refer to facilities that are not funded as part of the project but would not have been constructed or expanded if the project did not exist and without which the project would not be viable. The BRAVE project will not rely on associated facilities that could introduce risks beyond Category C thresholds.

7. Activities Escalating Risk Category

Any activity that, through screening under Annex 2, is determined to:

- Trigger significant or irreversible impacts,
- Require a full ESIA or ESMP consistent with Category B or A, or
- Present cumulative or large-scale environmental or social risks will be excluded from implementation.

Annex 3: E&S Monitoring Framework

E&S Monitoring				
Date:			Completed by:	
	Risks identified by screening	Mitigation measures	Implementation Progress	Observations/gaps action
E&S Risk Areas				
B1: Gender equality and risks				
B2: Risk of affecting vulnerable groups				
B3: Human Rights				
B4: Community health and safety				
B5: Labor / working conditions				
B6: Pollution, wastes, chemicals				
B7: Climate risks				
B8: Other risks				
ESMS Standards				
C1: Involuntary Resettlement and Access Restrictions				
C3: Cultural Heritage				
C2: Standard on Indigenous Peoples (PS7)				
C4: Biodiversity and Sustainable Use of natural Resources				
New risks emerged				

Annex 4: SEAH Risk Screening Checklist

Ensuring basic risk mitigation measures are in place ahead of stakeholder engagement	Responsibility	Comments
Does the AE have a SEAH Policy (or SEAH provisions in another policy)?		
If the AE has contracted out stakeholder consultations, does that entity have a SEAH Policy (or are they contractually bound to apply the AE's)?		
Does the AE have an employee Code of Conduct?		
If the AE has contracted out stakeholder consultations, does that entity have an employee Code of Conduct (or are they contractually bound to apply the AE's)?		
Have AE employees and consultants conducting stakeholder consultations been trained on preventing SEAH and the Code of Conduct?		
Does the AE have a grievance mechanism in place in case of early SEAH complaints from stakeholder engagement?		
Does the AE have a specialist on staff who can undertake the more advanced assessment in Stage 4 as well as deal with early SEAH complaints if they arise; and if not, does the AE require budget and /or assistance with this?		
Contextual Level (and Baseline Conditions)	Reference	Comments
Does the country have laws prohibiting sexual harassment / stalking generally?		
Do labor laws prohibit sexual harassment in the workplace?		
Does the country have laws prohibiting intimate partner violence (IPV)?		
What is the prevalence of GBV in the country?		
What is the legal age a person can marry?		

Despite any laws, what is the prevalence of child marriage in the country?		
What is the income level of the country?		
Where does the country rank on global gender indices?		
Is there a national action plan on GBV and/or sexual harassment?		
Does the country have specialized services for survivors of GBV (at both the national and local level) including women's shelters, adequate medical facilities and facilities which provide psycho-social support?		
Is the country currently experiencing war, internal conflict or humanitarian disaster?		
Project Level Risks	Responsibility	Comments
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 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?		
Will security personnel be used? Will they be armed?		
Will there be an influx of male workers into the project area (as opposed to only using local labor)?		
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?		
Are worksites or project activities based in remote locations? Will worksites be spread out, with isolated spaces?		
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 pressurised 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?		
Have any changes been made to project design or adaptive management undertaken due to concerns of stakeholders and communities? (If yes, work through this checklist again)		

Checklist of Potential SEAH Risk Mitigation Measures

Mitigation	Comments
POLICY AND CODE OF CONDUCT	
Does the AE have a SEAH policy which covers the project?	
Does the project have a Code of Conduct prohibiting SEAH by workers?	
Are clauses included in procurement contracts which commit contractors, subcontractors, suppliers, drivers and security personnel (if applicable) to adhere to the AE Code of Conduct (or EE equivalent)?	
SUPERVISION AND TRAINING	

(For larger, longer-term projects) Is there a trained SEAH specialist in the project team?	
Does the project plan to train all project workers on the Code of Conduct, SEAH and what is prohibited behaviour?	
RECRUITMENT AND PERFORMANCE ASSESSMENT	
Are recruitment procedures in place, with interview panels staffed by at least two people?	
Are candidates' identities checked at interview and are references requested?	
Are all workers required to be hired on formal contracts?	
Are written procedures in place for performance appraisals, promotions, and any performance-related pay increases (if applicable)?	
GRIEVANCE REDRESS MECHANISMS (GRM)	
Does the project have a GRM for community members to raise SEAH related complaints and concerns and is it confidential and survivor centred, with multiple reporting channels?	
Does the project have a GRM for project workers to raise SEAH-related complaints and concerns and is it confidential and survivor-centred, with multiple reporting channels?	
Are the staff who manage the GRMs equipped and trained to respond to SEAH reports in a safe and effective way?	
Are persons, communities and countries affected or potentially affected by the activities consulted and that effective SEAH GRMs to receive complaints and feedback are established and function in a collaborative manner and in a way that is complementary to GCF independent Redress Mechanism, and requiring that any gaps or weaknesses be addressed?	
Are affected communities (or likely to be affected, by the GCF-financed activities) informed about SEAH GRMs at all three levels – at the earliest opportunity of the stakeholder engagement process and in an understandable format and in all relevant languages?	
INVESTIGATION AND RESPONSE	
Are there written procedures for dealing with SEAH complaints or concerns and a dedicated and trained female staff member to deal with these (if no specialist is available)?	
Has a service provider mapping been undertaken to identify which services are available for survivors of SEAH?	
If there are no public or private service providers in the area, has the project identified and budgeted for outside providers?	
AWARENESS RAISING	

Will/have gender-sensitive and culturally appropriate outreach materials been prepared (such as posters, signage, etc.) on SEAH in all relevant languages?	
Has the community been informed about potential SEAH risks for the project and how to prevent them and use the GRM?	
Have any rapid mobile surveys or text surveys been developed to regularly obtain feedback from workers and/or the community?	
PROCUREMENT AND PARTNERSHIP	
Have SEAH prohibitions and mitigation measures been included in procurement documents?	
Are there clauses in the EE contract requiring them to prohibit SEAH in their workforce?	
PHYSICAL WORKSPACE	
Will separate facilities for men and women be provided at all work sites?	
Are SEAH risks included in workplace safety assessments, including worker accommodation and transportation?	
Are project workers informed of areas that are off-limits, for example areas around schools (or other places where children are present)?	