Environment and Social Safeguards

Integrated Policies and Procedures

CONTENTS

EXECUTIVE SUMMARY

The mission of World Wildlife Fund, Inc., (WWF) is to stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature, by conserving the world's biological diversity, ensuring that the use of renewable natural resources is sustainable, and promoting the reduction of pollution and wasteful consumption.

The purpose of the WWF Safeguards Integrated Policies and Procedures (SIPP) is to provide WWF staff and Project Teams with procedures to avoid (or minimize) adverse environmental impacts, and to enhance positive impacts to the maximum extent possible. In order to ensure this, environmental and social concerns are integrated into project design, and safeguards are an intrinsic part throughout the project cycle.

WWF's SIPP is composed of the following:

- Policy on Environment and Social Risk Management
- Policy on Protection of Natural Habitats
- Policy on Involuntary Resettlement
- Policy on Indigenous Peoples
- Policy on Accountability and Grievance Mechanism
- Standard on Pest Management
- Standard on Physical Cultural Resources
- Standard on Stakeholder Engagement
- Standard on Public Consultation and Disclosure
- Guidance on Projects Relating to Dams
- Implementation Arrangements

The SIPP requires WWF to ensure it has the necessary systems in place to implement this safeguards framework of policies and procedures, and it will be periodically updated and revised as necessary. It includes a commitment from WWF to maintain the appointments of appropriately skilled people to appraise projects, ensure they meet the safeguard requirements, and apply these standards fairly and consistently throughout WWF's project portfolio.

The SIPP is mandatory for all Global Environmental Facility (GEF) and Green Climate Fund (GCF) financed projects, and although not yet mandatory for WWF projects, it serves as standards for all WWF projects.

Abbreviations

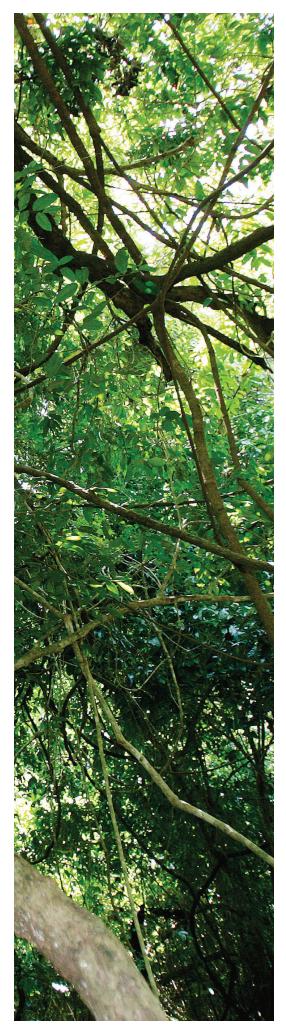|	
ADB	Asian Development Bank
CBD	Convention on Biological Diversity
CSO	Civil Society Organization
EA	Environmental Assessment
EMP	Environmental Management Plan
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
FAO	Food and Agriculture Organization
FPIC	Free, Prior, and Informed Consent
GCF	Green Climate Fund
GEF	Global Environment Facility
GPF	Global Program Framework
IFC	International Finance Corporation
ILO	International Labor Organization
IPM	Integrated Pest Management
IPP	Indigenous Peoples Plan
IPPF	Indigenous Peoples Planning Framework
IPs	Indigenous Peoples
IUCN	International Union for Conservation of Nature
IVM	Integrated Vegetation Management
M&E	Monitoring and Evaluations
NGO	Non-Governmental Organization
PCO	Project Complaints Officer
PCR	Physical Cultural Resources
PIF	Project Identification Form
PMP	Pest Management Plan
PPA	Participatory Poverty Assessment
PPMS	Project and Program Management Standards
PRA	Participatory Rural Appraisal
ProDoc	Project Document
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SCO	Safeguards Compliance Officer
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
SIPP	Safeguards Integrated Policies and Procedures
SRT	Safeguards Review Team
SST	Safeguards Screening Tool
ToR	Terms of Reference
UN	United Nations
UNDRIP	United Nations Declaration on the Rights of Indigenous Peoples
USAID	United States Agency for International Development
WHO	World Health Organization

Acknowledgments

Introduction

WWF's mission is to stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature by conserving the world's biological diversity, ensuring that the use of renewable natural resources is sustainable, and promoting the reduction of pollution and wasteful consumption.

Within the context of WWF's mission, the purpose of the Environment and Social Safeguards Integrated Policies and Procedures (SIPP) is to ensure that adverse environmental and social impacts are avoided or, when unavoidable, are minimized and appropriately mitigated and/or compensated for.

The policies, standards, and guidelines provided hereafter build upon the various policy and management instruments already developed and applied by World Wildlife Fund, Inc., (WWF) the U.S. Office of the WWF Global Network, and are expected to evolve and improve over time as this office implements projects funded by the Global Environment Facility (GEF), the Green Climate Fund (GCF), and other sources of financing. A first version of this document was produced in July 2012 as part of the process for WWF accreditation as a GEF Agency (representing the WWF Global Network). The SIPP was endorsed by the Senior Management Team of WWF in 2013 and was most recently updated in 2017. It was also agreed that this will be a living policy to be updated on the advice of a third party every five years to reflect advances in international best practices.

The SIPP guides the approach adopted by WWF at each stage of project development and provides safeguard requirements for all WWF projects. **This document describes the relevant policies included in the SIPP, while the annexes present more detailed procedures and descriptions of actions to address particular issues pertaining to the respective policies.**

The SIPP is composed of the following:
- Policy on Environment and Social Risk Management
- Policy on Protection of Natural Habitats
- Policy on Involuntary Resettlement
- Policy on Indigenous Peoples
- Policy on Accountability and Grievance Mechanism
- Standard on Pest Management
- Standard on Physical Cultural Resources
- Standard on Stakeholder Engagement
- Standard on Public Consultation and Disclosure
- Guidance on Projects Relating to Dams
- Implementation Arrangements

The Policy on Environment and Social Risk Management is an umbrella policy developed by WWF, which establishes the importance of:

- Integrated environmental and social management to identify and manage the environmental and social impacts, risks, and opportunities of programs and projects throughout the program and project life cycle; and

- Effective stakeholder engagement through disclosure of project-related information and consultation with local communities on matters that directly affect them.

The rest of the safeguard policies, standards, and guidelines included in the SIPP establish objectives and requirements to avoid, minimize, and, where residual impacts remain, offset or compensate for social and environmental risks and enhance sustainable development opportunities.

WWF Policies, Standards and Procedures

Policy on Environment and Social Risk Management

Introduction

The Policy on Environment and Social Risk Management is a framework policy to assist WWF in identifying potential environmental and social risks and benefits associated with a project.

The specific objectives of this policy are to:
- Ensure appropriate planning—especially in the identification and selection of alternatives to enhance environmental benefits—and avoid or, if avoidance is not possible, minimize, mitigate, and offset or compensate for adverse impacts on the environment and on affected communities;
- Ensure the effective management of environmental and social opportunities and risks at all stages of the project life cycle from conception to closure; and
- Provide for the engagement of diverse stakeholders and key parties, so that interested and affected parties have timely access to information and are empowered to meaningfully engage in issues that may affect them through all stages of the project life cycle.

Safeguards Screening Tool

The environment and social Safeguards Screening Tool (SST) is the first step of WWF's safeguards process to screen all relevant projects for potential impacts and categorize projects accordingly. When to implement the SST will be determined on the funding mechanism. For example:

For GEF and GCF projects where WWF is the Implementing Agency, the Environment and Social Safeguards Coordinator will conduct the screening and review the relevant documents from the Project Teams once a Project Identification Form (PIF) has been approved and a full Project Document (Prodoc) or a full project proposal development has commenced.[1] Field visits to the project sites will be part of this due dilligence. When necessary, the Environment and Social Safeguards Coordinator may also convene the Safeguards Review Team, which comprises in-house and external subject matter experts to review the SST.

For all other projects, the Environment and Social Safeguards Coordinator will review the screening during the project proposal submission stage, during the project concept stage, or at the relevant stage determined by the Environment and Social Safeguards Coordinator when activities financed under the project are well defined.

Categorization

The screening outputs may result in a project being designated as Category A (full or comprehensive Environment and Social Impact Assessment [ESIA] is required), Category B (partial assessment is required), or Category C (no further assessment is required).

Assessments and Mitigation Plans

For Category A and B projects, relevant assessments will identify impacts and mitigation measures that are incorporated in project design and would result in an Environmental and Social Management Plan (ESMP) (See Annex 1).

If a full or partial assessment is required, the Environment and Social Safeguards Coordinator will use the assessment results to determine what safeguards management plans are necessary for the Project Team to develop during project preparation. Safeguards management plans may include Environment and Social Management Plans, Resettlement Action Plans (RAPs), Pest Management Plans (PMPs), and Indigenous Peoples Plans (IPPs) (Please see relevant annexes for indicative outlines for these management plans).

In some cases, safeguards management plans may be developed even when no ESIA is necessary (no adverse impacts are expected), as a means for coordination and to promote positive impacts. All safeguards management plans will be reviewed and approved by the Environment and Social Safeguards Coordinator and WWF's Safeguards Compliance Officer.

Disclosure

All final safeguards documents, including WWF-specific safeguards documents such as the Safeguards Categorization Memo and the Safeguards Compliance Memo, will be publicly disclosed (See chapter on **Public Consultation and Disclosure** for more information).

Annex 1 provides more details about this policy and its procedures.

Policy on Protection of Natural Habitats

Introduction

WWF's environmental mission underpins all conservation work and is the foundation for the **Global Program Framework** (GPF) that unites the WWF Network. WWF's mission is to protect natural habitats, and it does not undertake any projects that would result in conversion or degradation of critical natural habitats, especially those that are legally protected, officially proposed for protection, or identified as having high conservation value.

The WWF Global Network's overall policies, program strategies, and operations are encapsulated within GPF and aim to:

- Protect and restore species and their habitats;
- Strengthen local communities' ability to conserve the natural resources they depend on;
- Transform markets and policies to reduce the impact of the production and consumption of commodities; and
- Mobilize people around the world to support conservation, promoting more efficient use of resources and energy and the maximum reduction of pollution.

In order to protect the environment, and in accordance with international agreements, WWF endorses and applies the precautionary approach for its projects and programs. Thus, where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.

WWF's work does not involve the development of large-scale physical infrastructure associated with significant negative environmental impacts. Therefore, we do not have specific safeguards criteria for physical infrastructure in natural habitats as such. WWF's Policy on Environment and Social Risk Management, mentioned in the previous section (See **Annex 1**), mandates a comprehensive assessment of all potential impacts, including those from smaller-scale infrastructural development. In addition, WWF's Project and Program Management Standards (PPMS) conservation planning approach mandates a detailed analysis of the direct threats and root causes affecting native species and their habitats.

Annex 5 provides more details on this policy.

Policy on Involuntary Resettlement

Introduction

All WWF efforts that involve resettlement are first and foremost under the guidance of the WWF Network's **Community Rights and Resources Policy**,[2] which is used to assess, address, and monitor potential resource access and use restrictions and involuntary resettlement impacts of proposed projects. The Community Rights and Resources Policy further includes measures to avoid or minimize involuntary resettlement and help ensure that project-affected persons improve or at least restore their standard of living.

For these reasons, it is the WWF Network's policy to ensure that:
- Adverse social or economic impacts on resource-dependent local communities resulting from conservation-related restrictions on resource access and/or use are avoided or minimized;
- Resolution of conflicts between conservation objectives and local livelihoods is sought primarily through voluntary agreements, including benefits commensurate with any losses incurred; and
- Through these measures, involuntary resettlement is avoided or minimized, including through assessment of all viable alternative project designs and, in limited circumstances where this is not possible, displaced persons are assisted in improving or at least restoring their livelihoods and standards of living relative to pre-displacement or pre-project levels (whichever is higher).

Consultations

All projects requiring resettlement activities by necessity must include active engagement with effected communities and free, prior, and informed consent (FPIC). In the context of resettlement actions, the Community Rights and Resources Policy includes specific provisions on consultation with project-affected people on any resettlement-related impacts, including that "WWF will (in addition to the measures above) design, document, and disclose a participatory process before appraisal for: (a) preparing and implementing project components, (b) establishing eligibility for mitigation measures, (c) agreeing on mitigation measures that help improve or restore livelihoods in a manner that maintains the sustainability of the park or protected area, (d) resolving conflicts, (e) monitoring implementation."

Mitigation Measures

For projects that involve involuntary resettlement or involuntary restrictions of access to natural habitats resulting in adverse impacts on the livelihoods of project communities, the Project Team will have to prepare a Resettlement Action Plan (RAP) or Resettlement Policy Framework (RPF) and/or Process Framework as part of project preparation. If a RAP is prepared, it must include the following:
- Efforts made to minimize displacement,
- Census and socioeconomic survey results,
- All relevant local laws and customary rights that apply,
- Resettlement sites,
- Income restoration institutional arrangements, an implementation schedule,
- Participation and consultation,

- Accountability and grievance,
- Monitoring and evaluation, and
- Costs and budgets.

Resettlement Involving Indigenous Peoples

In addition to the above policy, the WWF Network's **Policy on Indigenous Peoples** (first adopted in 1996 and updated in 2008; see chapter on Policy on Indigenous Peoples) recognizes the right of indigenous peoples not to be removed from the territories they occupy, and adopts the FPIC as the standard for consultations regarding interventions affecting indigenous territories and resource rights, including protected areas and for situations in which relocation is considered necessary as an exceptional measure.

Disclosure

Resettlement Action Plans and/or plans to address involuntary restriction on access to protected areas must be disclosed and in a place and language accessible to key stakeholders, including project-affected groups and Civil Society Organizations (CSOs), for at least 30 days (or if IPs exist in the project area, then for 45 days) before project design is finalized.

Annex 6 provides more details on this policy.

Policy on Indigenous Peoples

Introduction

Many of the world's remaining areas of high biodiversity and critical ecosystem service provision overlap with lands owned, occupied, and/or utilized by indigenous peoples (IPs). WWF has engaged with indigenous peoples in a range of ecosystems and capacities, from community-based work to support the sustainable and traditional uses of medicinal plants and animals to working with indigenous groups in managing traditional lands to support biodiversity conservation and ecological processes that maintain their lives and livelihoods.

The WWF Network's policy on **Indigenous Peoples and Conservation: WWF Statement of Principles**[3]—is to ensure that indigenous rights are respected in WWF's work, that indigenous peoples do not suffer adverse impacts from projects, and that they receive culturally appropriate benefits from conservation. WWF must ensure that:

- Projects respect indigenous peoples' rights, including their rights to FPIC processes and to tenure over traditional territories;
- Culturally appropriate and equitable benefits (including from traditional ecological knowledge) are negotiated and agreed upon with the indigenous peoples' communities in question; and
- Potential adverse impacts are avoided or adequately addressed through a participatory and consultative approach.

Further, the WWF Network's Indigenous Peoples and Conservation: WWF Statement of Principles endorses the provisions regarding indigenous peoples established in International Labor Organization (ILO) Convention No. 169[4] and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).[5] WWF's policy was first adopted in 1996 and was updated and re-published in 2008 following the United Nations General Assembly adoption of UNDRIP.

In 2008, the WWF Network also developed implementation guidelines to serve as a resource to support the implementation of the WWF Statement of Principles on Indigenous Peoples and Conservation: **"Mainstreaming WWF's Principles on Indigenous Peoples and Conservation in Project and Program Management,"**[6] which describes practical ways of mainstreaming the WWF Network policy commitments to indigenous peoples and their rights in the context of applying WWF Project and Program Management Standards (PPMS).

The above-mentioned implementation guidelines also contain a specific annex with detailed guidance on:

- Identifying indigenous peoples;
- Identifying representative and indigenous organizations; and
- Identifying indigenous lands, territories, and resources.

Mitigation Measures

Should the SST identify impacts on indigenous peoples, WWF requires the development of an action plan, and WWF has developed procedures for an Indigenous Peoples Plan (IPP), generic terms of reference (ToR) for an IPP, and generic ToR for an Indigenous Peoples Planning Framework (IPPF) .

Annex 7 provides more details about this policy.

Policy on Accountability and Grievance Mechanism

Introduction

WWF's Policy on Accountability and Grievance Mechanism, also known as **WWF Project Complaints Resolution Policy**, is not intended to replace project- and country-level dispute resolution and redress mechanisms. This mechanism is designed to:

- Address potential breaches of WWF's policies and procedures;
- Be independent, transparent, and effective;
- Be accessible to project-affected people;
- Keep complainants abreast of progress of cases brought forward; and
- Maintain records on all cases and issues brought forward for review.

Project-affected communities and other interested stakeholders may raise a grievance at any time to the Project Team and WWF. The Project Team will be responsible for informing project-affected parties about the Accountability and Grievance Mechanism. Contact information of the Project Team and WWF will be made publicly available.

Procedures

A grievance can be filed with the Project Complaints Officer (PCO) who is responsible for the WWF Accountability and Grievance Mechanism and who can be reached at:

Email: SafeguardsComplaint@wwfus.org

Mailing address:
Project Complaints Officer
Safeguards Complaints,
World Wildlife Fund
1250 24th Street NW
Washington, DC 20037

The PCO will respond within 10 business days of receipt, and claims will be filed and included in project monitoring.

In addition to the above, projects requiring FPIC[7] or triggering an IPP will also include local conflict resolution and grievance redress mechanisms in the respective safeguards documents. These will be developed with the participation of the affected communities in culturally appropriate ways and will ensure adequate representation from vulnerable or marginalized groups and subgroups.

Annex 8 provides more details about this policy.
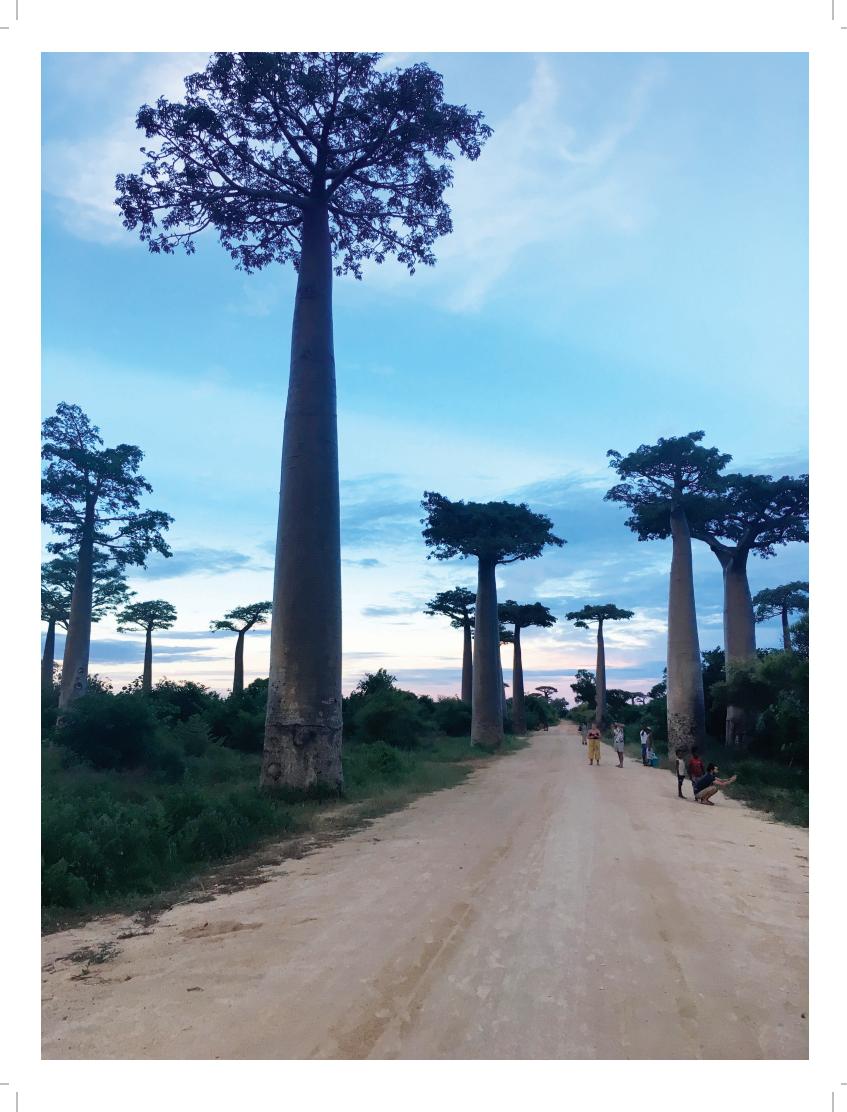
Standard on Pest Management

Introduction

This WWF **Standard on Pest Management** was developed in 2012 and ensures that, in any project applying or promoting the use of pesticides, the environmental and health risks associated with pesticide use are minimized and managed, and that safe, effective, and environmentally sound pest management is promoted and supported.

Requirements

Specifically, WWF projects will:

- Promote the use of demand-driven, ecologically based biological or environmental pest management practices (referred to as Integrated Pest Management in agricultural projects), reduce reliance on synthetic chemical pesticides, and include assessment of pest management issues, impacts, and risks in the Environment and Social Safeguards Screening process under the Policy on Environment and Social Risk Management;
- Require that, in the context of projects that it supports, pesticides are procured contingent on an assessment of the nature and degree of associated risks, taking into account the proposed use and intended users;
- Not allow the procurement or use of formulated products that are in World Health Organization (WHO)Classes IA and IB, or formulations of products in Class II,[8] unless there are restrictions that are likely to deny use or access by lay personnel and others without training or proper equipment;
- Not allow the procurement or use in its projects pesticides and other chemicals specified as persistent organic pollutants identified under the Stockholm Convention;[9]
- Follow the recommendations and minimum standards as described in the United Nations Food and Agriculture Organization (FAO) International Code of Conduct on the Distribution and Use of Pesticides[10] and its associated technical guidelines and procure only pesticides, along with suitable protective and application equipment, that will permit pest management actions to be carried out with well-defined and minimal risk to health, environment, and livelihoods;
- Support policy reform and institutional capacity development to (a) enhance implementation of Integrated Pest Management (IPM) and Integrated Vegetation Management (IVM), and (b) regulate and monitor the distribution and use of pesticides; and
- Disclose draft mitigation plans before project concept is finalized, in a place accessible to key stakeholders including project-affected groups and CSOs in a form and language understandable to them.

Annex 9 provides more details about this policy.

Standard on Physical Cultural Resources

Introduction

This WWF standard ensures that Physical Cultural Resources (PCR) are appropriately preserved and their destruction or damage is appropriately avoided. PCR include archaeological, paleontological, historical, architectural, and sacred sites including graveyards, burial sites, of unique natural values. The impacts on physical cultural resources resulting from project activities, including mitigating measures, may not contravene either the recipient country's national legislation or its obligations under relevant international environmental treaties and agreements.

Requirements

Specifically, WWF will:

- Analyze feasible project alternatives to prevent any adverse impacts and enhance positive impacts on PCR, through site selection and design;
- Avoid financing projects that could significantly damage PCR and, as appropriate, conduct field-based surveys using qualified specialists to evaluate PCR and feasible project alternatives that avoid significant PCR damage;
- Consult local people and other relevant stakeholders in documenting the presence and significance of PCR, assessing the nature and extent of potential impacts on these resources, and designing and implementing mitigation plans;
- Provide for the use of "chance find" procedures that include a preapproved management and conservation approach for materials[11] that may be discovered during project implementation; and
- Disclose final mitigation plans for at least 30 days (or if IPs exist in the project area, for at least 45 days) before project concept is finalized, in a place accessible to key stakeholders, including project-affected groups and CSOs, in a form and language understandable to them.

Standard on Stakeholder Engagement

Introduction

This Standard on Stakeholder Engagement was developed in 2018 and ensures that WWF is committed to meaningful, effective and informed stakeholder engagement in the design and implementation of all GEF and GCF projects. WWF's commitment to stakeholder engagement arises from internal standards such as WWF's **Project and Program Standards** (PPMS),[12] as well as WWF's commitment to international instruments such as United Nations Declaration on Indigenous People (UNDRIP). Stakeholder engagement is an overarching term that encompasses a range of activities and interactions with stakeholders throughout the project cycle and is an essential aspect of good project management. See definition of stakeholders on page 88 in Annex 10.

Effective stakeholder engagement can make a significant contribution to successful project design and implementation while improving the environmental and social sustainability of projects and enhance project acceptance. Stakeholder consultations provide input for inter alia environmental and social assessment of the project.

The intensity and scale of stakeholder engagement will vary with the type of project, its complexity, and its potential risks and impacts. It starts early in project planning and spans the entire life of the project.

Requirements

Specifically, WWF GEF and GCF Project Teams will:
- Engage with stakeholders throughout the project life cycle as early as possible in the project development stage, and in a time frame that enables meaningful consultations with stakeholders on project design.
- Engage in meaningful consultations with all stakeholders. For projects that effect rights and interests, lands, resources and territories of indigenous peoples, ensure Free Prior Informed Consent (FPIC). (For details on FPIC, please refer to the WWF Policy on Indigenous Peoples).
- Provide stakeholders with timely, understandable and accessible information and consult with them in a culturally appropriate manner which is free of manipulation, interference, coercion, discrimination and intimidation.
- Involve the following as part of stakeholder planning and engagement:
  - Stakeholder identification and analysis;
  - Planning how the engagement with stakeholders will take place;
  - Disclosure of information;
  - Consultation with stakeholders, addressing and/or responding to grievances, and;
  - Reporting to stakeholders.

During **Project Preparation**, WWF GEF and GCF Project Teams will:
- Identify the range of stakeholders. The list of stakeholders will vary depending on project activities and then develop a strategy to engagement them.
- Identify those Projects Affected Peoples who, because of their circumstances,

may be disadvantaged or vulnerable. Based on this, the Project Team will further identify individuals or groups who may have different concerns and priorities about project impacts, mitigation mechanisms, and benefits, and who may require different or separate forms of engagement.

- Conduct the stakeholder analysis in a culturally sensitive, nondiscriminatory and inclusive manner.
- Develop an appropriately scaled Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts.
- Disclose a draft SEP as early as possible and before project concept finalization. The Project Team will seek the views of the stakeholders on the SEP. A final SEP will need to be revised based on views and feedback, and then disclosed.
- In cases where the exact location of the project is not known, the SEP will take the format of a framework approach and will outline the general principles and a collaborative strategy to identify stakeholders and an engagement process to be implemented once the project location(s) are known.

During **Project Execution**, the Executing Agency will:
- Continue to engage with and provide information to all stakeholders, including Project Affected Peoples and others, throughout the life of the project in a manner appropriate to the nature of their interests, on the potential environmental and social risks and impacts of the project.
- Continue conduct stakeholder engagement in accordance with the SEP and build upon the channels of communication and engagement already established with stakeholders
- Communicate significant changes to the project that will result in additional risks and impacts, particularly when it will impact project affected people. The Executing Agency will provide information on such risks and impacts and consult with project affected people as to how these risks and impacts will be mitigated.
- Respond to concerns and grievances from project affected people related to environmental and social performance of the project in a timely manner.

WWF Environment and Social Safeguards Coordinator will oversee the Project Team's involvement with all stakeholders including Project Affected Peoples, Indigenous Peoples, and local CSOs as early as possible in the design/preparation process and ensure that stakeholder views and concerns are known and considered.

The WWF Environment and Social Safeguards Coordinator will review and approve all SEPs and oversee their implementation. The Executing Agency is responsible for the implementation of the Stakeholder Engagement Plan and will designate specific personnel to be responsible for the implementation and monitoring of stakeholder engagement activities.

The WWF Environment and Social Safeguards Coordinator will also ensure that the Executing Agency will continue to hold consultations throughout project implementation as deemed necessary to address environment and social safeguards issues that affect stakeholders.

Annex 10 provides more details on the implementation of this policy.

Standard on Public Consultation and Disclosure

Public Consultation

When developing environment and social safeguards assessments or developing management plans for a Category A or B project, the Project Team is required to conduct meaningful consultations with relevant stakeholders, including affected groups, indigenous peoples, CSOs, and local authorities, concerning the project's environmental and social impacts (positive and negative) and to take their views into account. The Project Team initiates such consultations as early as possible. For meaningful consultations, the Project Team provides relevant information in a timely manner and in a form and language that are understandable and accessible to diverse stakeholders. In addition, the Project Team should consult WWF's Project and Program Management Standards (PPMS), particularly the relevant sections on stakeholder engagement and the supporting documentation and tools provided. Where indigenous peoples are present and/or may be affected by the project, Project Teams should also consult implementation guidance for WWF's Indigenous Peoples and associated guidance on FPIC procedures.

If a project involves involuntary resettlement, before project concept finalization, the Project Team shall disclose final Resettlement Plans (including documentation of the consultation process) for 30 days or if IPs exist for 45 days prior to project concept finalization in a culturally appropriate and inclusive manner. The Resettlement Action Plan (RAP) or Resettlement Policy Framework (RPF) must be accessible to key stakeholders, including project-affected groups, and should be disclosed not only in English but also in relevant local languages.

PROCEDURES DURING PREPARATION

For Category A projects, the Project Team consults relevant stakeholders at least three times: (a) during scoping and before the terms of reference for the ESIA are finalized, (b) once a draft ESIA report is prepared, and (c) during monitoring and reviews. For the initial consultation, the Project Team provides a summary of the proposed project's objectives, description, and potential impacts. For consultation after the draft ESIA report is prepared, the Project Team provides a non-technical summary of the report's findings. In both cases, the summaries should be provided in advance of consultation and proactively disseminated to local stakeholders in a form and language meaningful to those being consulted.

Following the public consultation on the draft ESIA, the Project Team supplements the ESIA by adding details of the public consultation process, as necessary, including the Project Team's responses to concerns raised by the various stakeholders and details of measures taken to incorporate these concerns into project design and implementation. These will be publicly provided on the Safeguards Resource page (see section on Public Disclosure for links).

For Category B projects, the above procedures are also applied, especially in those cases where close relations with communities are important for project execution but may be less intensive and frequent.

For Category C projects, an environment and social assessments and management plans is generally not required, since these projects generally focus on capacity building and institutional issues. However public consultations are always

strongly recommended for field projects, in order to build up ownership and commitment and to mobilize local knowledge and expertise.

PROCEDURES DURING IMPLEMENTATION

The Project Team must continue to engage relevant stakeholders throughout project implementation and operation, as necessary, to address any environmental and social safeguard risks and other issues that affect them. The priority placed on consultation with potentially affected people (men and women) should, however, not be at the expense of consultations with other relevant groups (trade unions, chambers of commerce or agriculture, relevant municipal/regional/national administrations, locally elected leaders, etc.).
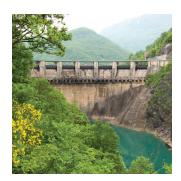
Disclosure

Disclosure of information concerning environmental and social issues relevant to the project is associated with decision points related to the project life cycle. The main decision points where disclosure of safeguards information is required are the following:

• Disclosure of Safeguards Project Categorization Memo;
• Disclosure of final safeguards reports, including management plans; and
• Disclosure of Safeguards Compliance Memo.

For Category A and B projects, on completion of the Environment Social Safeguards Coordinator's review of the SST, a **Project Categorization Memo**[13] will be drafted and approved by the Senior Director of Public Sector Support, Policy and Government Affairs of WWF-US.

All key safeguards documents, such as the final Project Categorization Memos, Compliance Memos, ESIAs for Category A projects, and ESMPs or other mitigation plans for Category B projects are publicly disclosed on the WWF Safeguards Resource web page (http://www.worldwildlife.org/pages/safeguards-resources). These documents will be disclosed for at least 30 days prior to project concept fianlization—and if IPs exist in the project area, then for 45 days. In addition to this, these final safeguards documents should be published on national websites of the Executing Agency and made available locally in specific locations accessible to affected communities. Only after all steps of the safeguards process, including all public consultations and all required disclosures, are completed and verified can the project be considered for agency approval by WWF GEF or GCF

Since project-affected people may not have reasonable access to a WWF office or to the Internet, the Project Team is also required to locally release all final key safeguards documents via hardcopy, translated into the local language and in a culturally appropriate manner, to facilitate awareness by relevant stakeholders that the information is in the public domain for review.

Guidance on Projects Relating to Dams

Introduction

In many river basins, WWF's freshwater conservation work is affected by the development of new dams or by the operations of existing dams. WWF is opposed to unsustainable dams that do not adhere to internationally recognized principles and criteria for good practice. WWF advocates that (1) no dams be built in, or affect, areas of high conservation value; (2) alternatives be fully considered before decisions are made to build new dams; and (3) principles, tools,[14] and inclusive, transparent processes be applied that make the best possible choices regarding the management of existing dams and development of new dams.

WWF actively works to assess existing dams to minimize impacts and maximize benefits and to reduce the demand for new dams. WWF advocates for improvement of operational management for environmental benefits at existing dams, through related policies, plans, or regulations. This can include:

- Establishing environmental flow regimes to restore ecological functions downstream of a dam by mimicking natural variability in river flows. Work may include assessment of environmental flow requirements, hydrological studies, design of reservoir releases, and policy work;
- Promoting retrofitting dams or infrastructure to improve performance and reduce need for new infrastructure;
- Promoting adaptation of existing infrastructure to allow for improved environmental performance; and
- Promoting decommissioning or removal of hazardous or obsolete dams.

Dam Safety

Given the above instances, and in line with WWF Network's position on dams, WWF can:

- **For GEF and GCF projects**, partner with a GEF and GCF Implementing Agency that is accredited for Safety of Dams safeguards to jointly support such efforts, so long as the other agency's safeguards system is applied for the entire project;
- Implement projects that involve working with the government or relevant sector on strategic river basin planning, with the goal of restricting or concentrating dams to appropriate rivers and watersheds of lower conservation value (e.g., already altered);
- Implement projects that result in recommendations for environmental flow requirements for a stream or river (e.g., timing, volume, duration);
- Implement projects that involve working with governments to ensure better regulation of hydropower sector;
- Implement projects that build capacity in the hydropower sector and government ministries to improve environmental-based approaches/tools for sustainable development; and
- Implement small or minor water infrastructure work whose impact is deemed not to trigger Safety of Dams safeguards through WWF's Policy on Environment and Social Risk Management (See **Chapter 1** and **Annex 1**).

Environmental Flows

For projects that affect water resources, the WWF Project Teams will avoid significantly altering flow regimes in ways that prevent freshwater ecosystems from delivering their provisioning, regulating, supporting, and cultural services, both upstream and downstream. The Project Team, therefore, will conduct necessary assessments and manage environmental flows for the conservation and sustainable use of biodiversity and ecosystem services. In addition to environmental flows, the assessments need to give equal attention to other aspects of the aquatic ecosystem, such as sedimentation and the viability of fisheries. The Project Team will ensure that flows are maintained so that they are optimally managed to allow for the multipurpose use of water, including water's ecological functions, and the integrity of river systems and wetlands. The partner country (or group of countries) in which the project takes place is responsible for ensuring compliance through its appropriate ministry or agency.

The Project Team ensures that relevant environmental and social assessments use appropriate methodologies to address the issue of environmental flows according to best practice, including the recommendations of the World Commission on Dams[15] and the Brisbane Declaration.[16] Before beginning any water flow project, the Project Team will conduct a participatory water needs audit, in consultation with relevant stakeholders who depend on the river flows for various needs, to determine the minimum baseline ecological flow requirements. Environmental flow analysis and management are carried out to the extent feasible in the context of river basin planning, so that the basin's entire water balance—now and in the future—is the framework in which environmental flows are determined. If no river basin plan exists, it is especially important that the project-based analysis consider the value of water across social, economic, and environmental objectives so that these objectives are not jeopardized by an individual project or the cumulative impacts of multiple projects.

Implementation Arrangements

WWF Environmental and Social Safeguards Responsibilities

The Lead Specialist, Safeguards, is the **Environment and Social Safeguards Coordinator** who has the overall responsibility for applicable WWF projects, ensuring that environmental and social issues are adequately addressed within the project life cycle, and will be ultimately responsible for the review and supervision of the implementation of safeguards.

The **Project Team** includes the Executing Agency and the Lead Technical Institution and is responsible for designing and executing the project consistent with the requirements of the WWF SIPP. This includes developing all necessary safeguards documents, and monitoring and evaluating progress on the agreed-upon actions that address safeguards during project implementation.

The Environment and Social Safeguards Coordinator will oversee implementation of this framework and will review and approve all key documents such as Environmental and Social Impact Assessments (ESIAs) terms of reference (ToR), Environment Impact Assessment (EIA), an Environmental Management Plan (EMP), and other project-specific safeguard plans and action plans developed during project implementation as needed. The Environment and Social Safeguards Coordinator may convene a Safeguards Review Team (SRT) if deemed necessary to review the SST. The SRT is a body of subject matter specialists from the WWF network as well as external experts.

During project preparation, the Environment and Social Safeguards Coordinator will be able to request from the Project Team any information it requires concerning project impacts on indigenous peoples and local communities and require further assessments or consultations as well as developing mitigation plans until WWF's SIPP requirements have been satisfactorily addressed. The Environment and Social Safeguards Coordinator will review and approve any action plans developed during project implementation in order mitigate any impacts of the proposed project.

The Environment and Social Safeguards Coordinator will maintain contact with the Project Team to obtain clarification on information provided and the preparation process, including participating in due dilligence mission trips to the sites.

During project preparation, the final project proposal/document (depending on the financing mechanism) will be reviewed against WWF objectives and procedures, assess the adequacy of the project's preparation process and implementation measures vis-à-vis the safeguard issues and requirements, including:
- Compliance with this SIPP;
- Adherence to the mitigation hierarchy against possible adverse environmental impacts;
- Adherence to the mitigation hierarchy against possible adverse social impacts;
- Adequacy and feasibility of the proposed safeguard mitigation measures and monitoring plans, including any Environmental and Social Management Plan, Pest Management Plan, Involuntary Resettlement Plan, or Indigenous Peoples Plan;
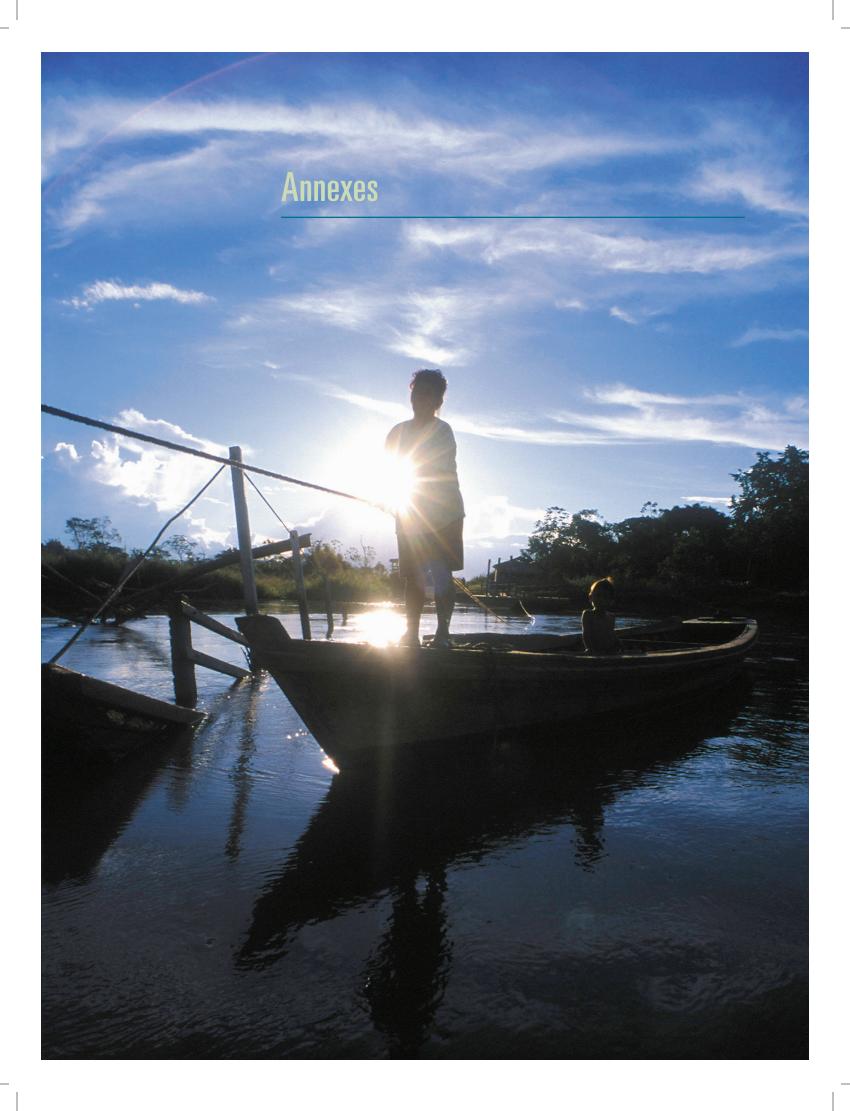
- Adequacy of the project's consultations processes and communication of the Grievance Mechanism;
- Identification of measures to avoid, minimize, or offset adverse impacts;
- Capacity, including but not limited to, technical and financial capacity of the Project Team to implement the project and any required safeguard-related measures during the preparation and implementation of the project; and
- Clear documentation of the foregoing, accessible to stakeholders.

Through this review, the **Environment and Social Safeguards Coordinator** may find the safeguard process and measures satisfactory, or may find the need for further discussion with, and steps by, the Project Team to achieve the objectives of this SIPP, including revising safeguard measures and documents, as appropriate.

Project-specific mitigation plans are to be disclosed to all stakeholders, including affected communities and Civil Society Organizations (CSOs) prior to project concept finalization. Before plans can be disclosed, the **Environment and Social Safeguards Coordinator** must review and approve all final plans. The **Project Team** must also disclose to affected parties the final plans prior to implementation and any action plans prepared during project implementation. In all cases, disclosure should occur in a manner that is meaningful and understandable to the affected people for their consent. All final and relevant safeguards documents will be disclosed for GEF and GCF projects on the WWF Safeguards web page (http://www.worldwildlife.org/pages/safeguards-resources).

During project implementation, safeguards compliance will be tracked along with performance toward project objectives. At each performance-reporting stage, generally on a quarterly basis, the **Project Team** will revisit the safeguard issues to assess their status and address any issues that may arise. In cases where the **Project Team** is implementing an Environmental and Social Management Plan (ESMP), other project and/or site-level plans, or other mitigation measures, the **Project Team** will report on the progress of such implementation in parallel to or as part of reporting for other project elements. The intent of this process is to ensure that the environmental and social safeguard issues, are continually monitored and that adverse effects are mitigated throughout project implementation.

The Environment and Social Safeguards Coordinator will monitor and ensure implementation of safeguards during project implementation through check-in meetings and field visits during annual supervision. The Environment and Social Safeguards Coordinator will review and approve any safeguard-related action plans required prior to, or developed during, implementation of project activities.

Annexes

Procedures for the Policy on Environment and Social Risk Management

1.1 Introduction

This annex provides a methodology for conducting Environmental and Social Assessments of proposed projects to help ensure their environmental and social soundness and sustainability.

It lays out the process for an integrated social and environmental assessment of projects and identifies and assesses the potential impacts of a proposed project on physical, biological, socioeconomic, and physical cultural resources; evaluates alternatives; and proposes appropriate avoidance, minimization, or mitigation alternatives, as well as management and monitoring measures.

1.2 Methodology

Environmental and social assessment work carried out under this policy determines whether the operations trigger any specific risks covered by any of the other safeguard policies included in this SIPP and, therefore, whether those requirements need to be met. This policy requires a screening process for each proposed project, as early as possible, to determine the extent and type of environmental and social assessment required of the project so that appropriate studies are undertaken proportional to potential risks and to direct, indirect, cumulative, and associated impacts. This includes the application of strategic, sectorial, or regional environmental and social assessment, as and when appropriate.

Depending on the project, a range of methods and tools can be used to satisfy the WWF's policy requirement and to document the results of such an assessment, including the mitigation measures to be implemented, which will reflect the nature and scale of the project.[17]

DIFFERENT ENVIRONMENT AND SOCIAL ASSESSMENTS AND TOOLS

An **Environmental and Social Impact Assessment (ESIA)** is an instrument to identify and assess the potential environmental and social impacts of a proposed project, evaluate alternatives, and design appropriate mitigation, management, and monitoring measures.

An **Environmental and Social Audit** is an instrument to determine the nature and extent of all environmental and social areas of concern for an existing project or activities. The audit identifies and justifies appropriate measures and actions to mitigate the areas of concern, estimates the cost of the measures and actions, and recommends a schedule for implementing them. For certain projects, the environmental and social assessment may consist of an environmental or social audit alone; in other cases, the audit forms part of the environmental and social assessment.

An **Environmental and Social Management Plan (ESMP)** is an instrument that details (a) the measures to be taken during the implementation and operation of a project to eliminate or offset adverse environmental and social impacts,

or to reduce them to acceptable levels; and (b) the actions needed to implement these measures.

An **Environmental and Social Management Framework (ESMF)** is an instrument that examines the risks and impacts when a project consists of a program and/or series of subprojects, and the risks and impacts cannot be determined until the program or subproject details have been identified. The ESMF sets out the principles, rules, guidelines, and procedures to assess the environmental and social risks and impacts. It contains measures and plans to reduce, mitigate, and/or offset adverse risks and impacts; provisions for estimating and budgeting the costs of such measures; and information on the agency or agencies responsible for addressing project risks and impacts.

Specific features of a project may require the Project Team to utilize specialized methods and tools for assessment, such as a Resettlement Plan, Livelihood Restoration Plan, Indigenous Peoples Plan, Biodiversity Action Plan, Cultural Heritage Management Plan, and other plans as agreed with WWF (Please see **Annexes 2**, **5**, **6** for indicative templates of these tools).

1.3 Screening

The Project Team, in collaboration with relevant stakeholders, will complete the SST and the WWF Environment and Social Safeguards Coordinator will screen the project for environmental and social impacts to determine the specific type and level of environmental and social assessment required. This screening will entail reviewing proposed project activities for the potential of adverse impacts, which may require additional assessment. The main output of the screening is the categorization of the project. For GCF projects, the SST includes additional screening questions on labour, climate change, and community health and safety.[18]

1.4 Categorization

Categorization follows the principle of using the appropriate type and level of environmental and social assessment for the type of context, nature, and scope of activities involved. Working with the WWF Environment and Social Safeguards Coordinator, the Project Team may suggest a category and provide sufficient supporting documentation and baseline data to the WWF Environment and Social Safeguards Coordinator to review and validate the proposed category. The responsibility of the appropriate categorization is therefore shared by WWF and the Project Team and should be based on reasonably accurate due diligence material. Categorization of the project based on the screening will be publicly and appropriately disclosed.

- **Category A** projects are those that are likely to have significant adverse social or environmental impacts that are sensitive, diverse, or unprecedented. Category A projects require additional approval by WWF's Ventures Committee[19] before safeguards procedures can continue beyond this step.
- **Category B** projects are those likely to have potential adverse social and/or environmental impacts, but whose impacts are less significant than in Category A and can be properly addressed and/or mitigated in the project.
- **Category C** projects are those that are likely to have minimal to no social and environmental impacts.

GUIDANCE ON CATEGORIZATION CRITERIA

Project Type and Scale

Category A projects include those that have one or more of the following attributes that make the potential impacts "significant": direct pollutant discharges that are large enough to cause degradation of air, water, or soil; large-scale physical disturbance of the site and/or surroundings; extraction, consumption, or conversion of substantial amounts of forest and other natural resources; measurable modification of hydrologic cycle; hazardous materials in more-than-incidental quantities; and involuntary displacement of people and other significant social disturbances.

Projects entailing rehabilitation, maintenance, or upgrading rather than new construction will usually be in Category B. A project with any of these characteristics may have impacts, but they are less likely to be "significant." However, each case must be judged on its own merits. Many rehabilitation, maintenance, and upgrading projects may require attention to existing environmental problems at the site rather than potential new impacts.

Project Location

The selection of a screening category often depends substantially on the project setting, while the "significance" of potential impacts is partly a function of the natural and sociocultural surroundings. There are a number of locations in which projects should be seriously considered by the Environment and Social Safeguards Coordinator for "A" classification:

- In or near sensitive and valuable ecosystems—wetlands, wild lands, coral reefs, and habitat of endangered species;
- In or near areas with archaeological and/or historical sites or existing cultural and social institutions;
- In densely populated areas, where resettlement may be required or potential pollution impacts and other disturbances may significantly affect communities;
- In regions subject to heavy development activities or where there are conflicts in natural resource allocation;
- Along watercourses, in aquifer recharge areas, or in reservoir catchments used for potable water supply; and
- On lands or waters containing valuable resources (such as fisheries, minerals, medicinal plants, and prime agricultural soils).

The precise identification of the project's geographical setting at the screening stage greatly enhances the quality of the screening decision and helps focus the assessment on the important environmental issues.

A map of the project area that includes key environmental features (including cultural heritage sites) is invaluable for this purpose. Local institutions and non-governmental organizations (NGOs) are also valuable sources. In the absence of any such information, the Environment and Social Safeugards Coordinator should consider sending a reconnaissance mission to provide the basis for proper screening.

Sensitivity of Issues
Environment and Social issues that are sensitive always require special attention during the safeguards review process. These issues may include (but are not limited to) disturbance of tropical forests, conversion of wetlands, potential adverse effects on protected areas or sites, encroachment on lands or rights of indigenous peoples or other vulnerable minorities, involuntary resettlement, impacts on international waterways and other transboundary issues, and toxic waste disposal.

The best way to ensure proper treatment of such issues is to classify the project as Category A, so that the level of effort will be adequate in terms of analytical expertise, decision-making, interagency coordination, and public involvement.

Nature of Impacts
It is difficult to describe the nature of impacts without having some overlap with the concepts of sensitivity and project type. The Environment and Social Safeguards Coordinator should take into consideration the following examples of impacts that warrant Category A attention:
- Irreversible destruction or degradation of natural habitat and loss of biodiversity or environmental services provided by a natural system;
- Risk to human health or safety (for example, from generation, storage, or disposal of hazardous wastes, or violation of ambient air quality standards); and
- Absence of effective mitigatory or compensatory measures.

Magnitudes of Impacts
There are a number of ways in which magnitude can be measured, such as the absolute amount of a resource or ecosystem affected, the amount affected relative to the existing stock of the resource or ecosystem, and the intensity of the impact and its timing and duration. In addition, the probability of occurrence for a specific impact and the cumulative impact of the proposed action and other planned or ongoing actions may need to be considered. Where it is possible to assign probabilities to potential impacts, which often cannot be done without detailed analysis, the risk of occurrence becomes an aspect of magnitude.

One of the requirements of a full ESIA is that other current and proposed development activities within the project area and more spontaneous activities spurred by a project (such as migration of people into an area opened up by a road project) be taken into account.

Such cumulative or induced impacts may sometimes be the primary determinant of the appropriate level of categorization.

1.5 Procedures and Guidelines for Category A Projects

1.5.1 Introduction

Category A projects require a full environmental and social scoping, and full ESIA with a detailed ESMP, regardless of the legislative and regulatory requirements for environmental assessments.

A proposed project is classified as Category A if it is likely to have significant adverse impacts that are sensitive, diverse, or unprecedented, or that affect an area broader than the sites or facilities subject to physical works.

In general, WWF does not carry out projects that would be Category A. However, the following projects or components included in this list are potentially within the scope of WWF's portfolio and could have adverse impacts that normally warrant classification in Category A.
- Aquaculture and mariculture (large-scale);
- Large-scale land agro-industry projects;
- Large-scale afforestation/reforestation, including logging operations, use of mangroves and wetlands;
- Forest industry operations, such as sawmills and pulp and paper mills;
- Land resettlement schemes (planned and unplanned);
- Irrigation, drainage, and flood control (large-scale); and
- Resettlement of local populations and projects that may have potentially significant adverse impacts on physical cultural resources.

1.5.2 Scoping Phase

For Category A projects, prior to initiating the full ESIA, a scoping study should be carried out. The primary functions of scoping are to identify significant environmental and social issues that the ESIA should focus on, indicate what type of impact studies and which expertise is required, and establish the ToR for the ESIA. The scoping report must be submitted to WWF and approved by WWF's Ventures Committee before the ESIA may proceed.

A scoping exercise will include identification of mandatory national and local environmental and social scoping requirements if these exist and identification of necessary steps to bring the process in line with WWF SIPP. This could include:
- Providing an initial project description and basic site environmental and social information (primarily sourced from project feasibility reports, site inspections, and secondary data);
- Identifying and reviewing national/local project-planning requirements, including preliminary discussions with relevant authorities necessary for approval on assessment requirements, processes, and important issues;
- Initially identifying the major environmental and social impacts;
- Disclosing project information to interested parties;
- Conducting informal discussions with stakeholders, including local communities and NGOs on important issues;
- Convening a scoping meeting(s) with interested parties to introduce the project, identify the range of issues, and establish the focal issues; and
- Drafting the Terms of Reference for the ESIA report.

Initial identification of issues involves consideration of the initial design and operational approach of the project, and the typical environmental and social impacts likely to be caused by this type of project to provide a reasonable picture of the likely impacts. Assessing the relative significance of the issues is often based on public concern and the opinion of specialists with previous experience with the project type, the project area, and similar sites. However, issues are always project-specific and hence need to be identified for each project.

Consultations during scoping often establish a long list of environmental and social issues based on the range of stakeholder interests. It will be necessary to determine which of these issues are significant. Identifying the key issues is ideally done as the final task of a scoping meeting or during overall issue identification among key stakeholders. This ensures that the Environment and Social Safeguards Coordinator understands where stakeholders' concerns fit relative to others, with consensus ideally being reached on the assessment's focus. Issues may change in importance as additional information is obtained during assessment preparation.

The output of scoping is usually is a ToR for the ESIA report, tailored to the project. The ToR is an indispensable plan for Category A projects because it establishes the scope of the ESIA and a clear plan of action to prepare it.

1.5.3 The ESIA Phase and Preparation

A full ESIA is always conducted by a safeguards expert (e.g., a consultant or a consultant team) for the Executing Agency. The WWF Environment and Social Safeguards Coordinator can be consulted during the ESIA—however, they will not influence the study results, as independence of the expert opinion is required.

The safeguards expert or team should make use of any documentation or reports produced during the initial steps of project conceptualization (e.g., situation analysis, stakeholder analysis, Theory of Change analysis [i.e., results chains]) and should be mindful of people's time investment during the preceding steps and ensure that preceding work is not duplicated.

An ESIA report for a Category A project focuses on the significant environmental issues of a project. The report's scope and level of detail should be commensurate with the project's potential impacts.

The outline of an indicative ESIA report should include the following items (not necessarily in the order shown):
- **Analysis of policy, legal, and administrative framework**. Discusses the policy, legal, and administrative framework within which the ESIA is carried out. Identifies relevant international environmental agreements to which the country is a party. Explains the environmental requirements of any co-financing partners, if applicable.
- **Project description**. Concisely describes the proposed project and its geographic, ecological, social, and temporal context, including any implications of the project outside the project site. Indicates the need for any RAP or IPP. Normally includes a map showing the project site and the project's area of influence. Attention should be paid to associated infrastructure (e.g., fencing for protecting natural areas).

- **Stakeholder identification and analysis.** The stakeholder analysis carried out during the preceding steps of project conceptualization will be expanded by taking into account potential impacts identified in the screening phase. This might include adding new stakeholders (e.g., those that might potentially be affected by the identified impacts) as well as deepening the analysis. Compared with the existing analysis, more detail might be required on stakeholders' interests, roles, and responsibilities; their rights (covering both legal and non-legal rights); and requirements for effective consultation and participation.
- **Environmental and social baseline data.** Assesses the dimensions of the study area and describes relevant physical, biological, and socioeconomic conditions, including any changes anticipated before the project commences. Also takes into account current and proposed development activities within the project area but not directly connected to the project. Data should be relevant to decisions about project location, design, operation, or mitigation measures. The section indicates the accuracy, reliability, and sources of the data. Socioeconomic analyses may be required, for which generic ToR are available (See **Annex 2: Guidelines for Designing Terms of Reference for Socioeconomic Assessments**).
- **Environmental and social impact assessment of project proposal.** Predicts and assesses the likely positive and negative impacts of the project proposal, in qualitative and, to the extent possible, quantitative terms. Identifies mitigation measures and any residual negative impacts that cannot be mitigated. Explores opportunities for environmental and social enhancement. Identifies and estimates the extent and quality of available data, key data gaps, and uncertainties associated with predictions and specifies topics that do not require further attention. The assessment takes into account all WWF's environment and social safeguards policies and procedures, but also covers all other impacts as identified during screening and scoping.
- **Analysis of alternatives.** Systematically compares feasible, less-adverse alternatives to the proposed project site, technology, design, and operation—including the "without project" situation—in terms of their potential environmental impacts; the feasibility of mitigating these impacts; estimates on cost implications (capital and recurrent costs); their suitability under local conditions; and their institutional, training, and monitoring requirements (See **Annex 3: Guidance on Analysis of Alternatives**).
- **Results of consultations.** A summary of consultations carried out during the ESIA process and their recommendations should be included in the report, with an explanation of how these results have been taken into account.
- **Environmental and Social Management Plan (ESMP).** Covers mitigation measures, monitoring, capacity building, and institutional strengthening.
- Appendixes should include:
  ○ List of ESIA report preparers, including both individuals and organizations;
  ○ References, including written materials both published and unpublished, used in study preparation;
  ○ Record of interagency and consultation meetings, including consultations for obtaining the informed views of the affected people and local NGOs; the record specifies any means other than consultations (e.g., surveys) that were used to obtain the views of affected groups and local NGOs;

- Tables presenting the relevant data referred to or summarized in the main text; and
- List of associated reports (e.g., Resettlement Plan or Indigenous Peoples Plan).

1.5.4 The ESIA Review

The Environment and Social Safeguards Coordinator will review and approve the final ESIA report and the ESMP. This is done before the Project Team finalizes the full project proposal or the ProDoc, in the case of GEF projects or the full project proposal for GCF. The aim is to evaluate the quality of the ESIA and to determine whether the information provided in the ESIA report is sufficient for understanding potential impacts of the project and its possible alternatives and for finalizing the project design in a way so as to avoid, minimize, and/or mitigate adverse impacts and to enhance benefits. This stage would also include reviewing the ESMP proposed.

The Environment and Social Safeguards Coordinator will work in close partnership with the Project Team and WWF's Operations Team when necessary to spell out the legal covenants confirming the need for implementing the ESMP in order to make the project acceptable to WWF.

1.6 Procedures and Guidelines for Category B Projects

1.6.1 Introduction

The environment and social impacts associated with these projects may be adverse but are generally of a lesser degree or significance than high-risk projects. Few, if any, of the impacts are irreversible, and mitigation measures for these projects can therefore be more easily prescribed. The following projects and components may have environment and social impacts for which a more-limited Environment and Social Assessment (EA) is appropriate. These include:

- Agro-industries (small- and medium-scale);
- Energy efficiency and energy conservation;
- Irrigation and drainage (small-scale);
- Watershed management or rehabilitation, river basin management planning, international water management, and agreements for medium-sized projects;
- Protected areas and biodiversity conservation;
- Range and pasture management and livestock management;
- Small- and medium-sized aquaculture, including small- and medium-scale industrial and artisanal fisheries;
- Rehabilitation or maintenance of highways or rural roads;
- Renewable energy (other than hydroelectric dams);
- Rural electrification;
- Limited bioenergy projects;
- Climate adaptation projects;
- Reforestation/afforestation;
- Rural water supply and sanitation;
- Tourism and forest industry development, including industrial and community uses; and
- Watershed projects (management or rehabilitation, land use changes affecting biodiversity, and projects that may have potentially minor adverse impacts on physical and cultural resources).

1.6.2 Partial ESIA or Management Plan

For Category B projects, a partial ESIA is carried out following the same structure and with the key elements as described above, but with a scope and depth of analysis that is clearly more limited than that of a full ESIA. It will focus on one or very few selected and clearly delineated environmental and social issues identified during the screening process. As such, it does not provide a full analysis of policy, legal, and administrative framework but is very specific to the topic. Also, the collected baseline data is targeted.

Depending on the type of project and the nature and magnitude of the impacts, this report may include, for example, a limited ESIA or ESMP.

The required limited ESIA report for all Category B projects should include the elements listed below. These items (not necessarily listed by importance) are:

- Description of the project and the environmental setting;
- Consideration of technical alternatives to improve the environmental benefits;
- Explanation of how the concerns of local communities are addressed;
- Analysis of the potential environmental and social impacts;
- An environmental and social management plan; and
- Summary of the consultation, its results, and recommendations.

1.6.3 Partial ESIA and ESMP Review

The Environment and Social Safeguards Coordinator will review and approve the partial ESIA, ESMP, or any other relevant management plan that is conducted for the project.

1.7 Procedures and Guidelines for Category C Projects

A proposed project is classified as Category C if it is likely to have minimal or no adverse environmental impacts. Beyond screening, no further EA action is required for a Category C project.

An ESIA is normally not required for the following project types:
- Education;
- Natural resource assessments and monitoring;
- Environmental and sustainable development analysis;
- Monitoring and evaluation exercises;
- Desk studies, workshops, meetings, scientific research, and field surveys (however, the nature of the research may require reclassification as Category B);
- Research and extension in agriculture, forestry, fisheries, natural resource management, remote sensing, and geospatial analysis;
- Capacity development, communication, and outreach programs, including training; and
- Minor construction activities and maintenance of installations and institutional development.

Beyond screening, no further EA action is required for a Category C project.

1.8 Project Implementation

During project implementation, the Project Team (including Executing Agency and/or lead technical ministry) reports on compliance with (a) measures agreed to by WWF on the basis of the findings and results of the ESIA, including implementation of any ESMP, as set out in the project documents; (b) the status of mitigatory measures; and (c) the findings of monitoring programs. WWF bases supervision of the project's environmental and social aspects on the findings and recommendations of the ESMP, including measures set out in the legal agreements, any ESMP, and other project documents.

Guidelines for Designing Terms of Reference for Socioeconomic Assessments

2.1 Introduction

A socioeconomic assessment is made up of analytical, process, and operational elements, combining:

- The analysis of context and social issues with
- A participatory process of stakeholder consultations and involvement, to provide
- Operational guidance on developing a project design, implementation, and monitoring and evaluation (M&E) framework.

The Project Team is responsible for drafting the ToR for socioeconomic assessments. The Environment and Social Safeguards Coordinator will provide guidance and technical assistance to the Project Team to undertake the social assessment and verify, assess, and appraise the social assessment findings, as an integral part of its social analysis.

This annex provides a generic ToR for socioeconomic assessments. This ToR is offered as guidance only; the Environment and Social Safeguards Coordinator may provide assistance to the Project Team in adapting this general framework based on country, sector, and project-specific needs and specificities. The scope and depth of the social assessment should be determined by the complexity and importance of the issues studied, taking into account the skills and resources available.

To the extent possible, the project assessment should build on existing data and analysis relevant to the project. Consideration should be given to doing the assessment in two stages, by first conducting a rapid assessment of available data, identifying stakeholders and key issues, and then by undertaking a gap analysis of where additional data or consultations are required. Based on that, an update and further detailing of the ToR may be done.

2.2 Sample Terms of Reference for a Socio Economic Assessment

This section should state the purpose of the ToR, identify the development project to be assessed, and explain the implementing arrangements for the social assessment.

BACKGROUND INFORMATION

Pertinent background information for potential parties who may conduct the assessment, whether they are consultants or government agencies, would include a brief statement of the rationale for the project, its intended objectives, a description of its major components, the Executing Entity(ies), its current status and timetable, and whether there are any associated projects.

PURPOSE AND OBJECTIVES

Summarize the general objectives and scope of the assessment, briefly lay out the main design and methodological issues related to completing the assessment, and discuss its timing in relation to the project preparation, design, and implementation.

DESCRIPTION OF THE PROPOSED PROJECT

Provide a full description of the project to the extent known when the socioeconomic assessment is undertaken. Include the following information: location, size, schedule and planned sequence of activities, resources available, expected implementation arrangements, and life span of the project. If the proposed project has more than one component, describe each one as it relates to social analysis.

DESCRIPTION OF THE SOCIOCULTURAL, INSTITUTIONAL, HISTORICAL, ECONOMIC, AND POLITICAL CONTEXT

Conduct a rapid review of available sources of information to describe the sociocultural, institutional, historical, and political context in which the project operates. The review should include qualitative descriptions and quantitative indicators of development trends relevant to the project, such as significant demographic changes, patterns of asset ownership and livelihoods, external political or economic environment, etc. The purpose of this exercise is to describe what constraints and opportunities the context poses to the project.

Sociocultural context: Describe the most significant social and cultural features that differentiate social groups in the project area. Describe their different interests in the project and their levels of influence. In particular, explain any particular effects the project may have on the poor and excluded. Does the project offer any opportunities to influence the behavior of and outcomes for such groups? Are there any known conflicts among groups that may affect project implementation?

Institutional context: Describe the institutional environment; consider both the presence and function of public, private, and civil society institutions relevant to the operation. Are there important constraints within existing institutions (e.g., disconnect between institutional responsibilities and the interests and behaviors of personnel within those institutions)? Or are there opportunities to utilize the potential of existing institutions (e.g., private or civil society institutions) to strengthen implementation capacity?

Historical context: Describe the "big picture"—those conditions in the history of the country that might uniquely impinge upon the project.

Political context: Describe the political background relevant to the project.

LEGISLATIVE AND REGULATORY CONSIDERATIONS

Review all national legislation and regulations pertinent to the project, as well as the broader policy and reform context within which the project takes place. Pay particular attention to laws and regulations governing the project's implementation and the access of poor and excluded groups to goods, services, and opportunities provided by the project. In addition, review the enabling environment for public participation and development planning. Social analysis should build on strong aspects of the legal and regulatory systems to facilitate program implementation and identify weak aspects while recommending alternative arrangements. (The ToR should specify those alternative arrangements that are known and require the consultant to investigate other arrangements.)

KEY SOCIAL ISSUES

The social analysis provides the baseline information for designing the social development strategy. The analysis should determine what the key social and institutional issues are in relation to project objectives; identify the key stakeholder groups in this context and determine how relationships between stakeholder groups will affect or be affected by the project; and identify expected social development outcomes and actions proposed to achieve those outcomes. Social development outcomes are the socially relevant results the project is expected to achieve, such as poverty reduction, equity and inclusion, strengthening of social capital and social cohesion, and promotion of accountable and transparent governance, as well as the mitigation of adverse impacts arising out of the project.

The key elements and entry points for the social analysis relevant to the project encompass:

- **Social diversity:** Examine how people are organized into different social groups, based on the status ascribed to them at birth—according to their ethnicity, clan, locality, language, class, or some other marker—or on the status or identity they have achieved or chosen—civil servant, industrial laborer, white-collar worker, environmentalist, etc. Importantly, an analysis of social diversity also includes looking at the ways in which such diversity interacts with social and power relations and the implications this has for questions of access, capabilities, and opportunities.
- **Institutions, rules, and behavior:** Examine social groups' characteristics, intra-group and inter-group relationships, and the relationships of those groups with public and private (e.g., market) institutions (including the norms, values, and behavior that have been institutionalized through those relationships). Such an analysis should provide a detailed assessment of the formal and informal organizations likely to affect the project and the informal rules and behaviors among them. Possible institutional constraints and barriers to project success, as well as methods to overcome them, should be described.
- **Stakeholders:** See definition of stakeholders on page 88 in Annex 10.
- **Participation:** Examine opportunities and conditions for participation by stakeholders—particularly the poor and vulnerable—in the development process (e.g., contributing to project design, implementation, and/or monitoring; influencing public choices and decision-making; holding public institutions accountable for the goods and services they are bound to provide; providing access to project benefits and opportunities; etc.). Otherwise excluded groups affected by the project as well as project beneficiaries should be brought into the social assessment process, and appropriate mechanisms to sustain such participation in project implementation and monitoring should be deployed.
- **Social risks:** Identify social risks (e.g., country risks, political economy risks, institutional risks, exogenous risks, and vulnerability risks, including but not limited to those that may trigger WWF Environment and Social safeguard policies). Social risk analysis examines the social groups vulnerable to stress and shocks and the underlying factors that contribute to this vulnerability. Drawing on this, risk management plans should be prepared with an eye to addressing these concerns during project design, implementation, and monitoring and evaluation.

Analysts examine these key elements in order to assess and describe the opportunities, constraints, and likely social impacts of the proposed operation. The consultant should fill the gaps in the information on these issues that the Project Team identifies and should summarize information from other organizations where available.

DATA COLLECTION AND RESEARCH METHODS

Describe the design and research methodology for the social analysis. In this regard:

- Clarify the research objective by stating the research hypotheses and identifying the social processes and relationships to be examined by the social assessment;
- Build on existing data;
- Clarify the units of analysis for the social assessment: intra-household, household level, and communities/settlements and other relevant social aggregations on which data is available or will be collected for analysis;
- Choose appropriate data collection and analytical tools and methods, employing mixed methods wherever possible; mixed methods include a mix of quantitative and qualitative methods, and a mix of data from different units of analysis for triangulation of results;
- Provide the rationale for sampling employed, including criteria for research sites and selection of respondents. Employ representative sampling wherever possible. When this is not feasible (such as when dealing with impacts on a discrete population group), explain the reason and criteria for purposive sampling employed. For purposive sampling or qualitative research, research rigor is enhanced by providing a control group or establishing matching pairs to obtain robust results; and
- Establish baselines and/or benchmarks with indicators for use in future monitoring; indicators should be of such a nature that results and impacts can be disaggregated by gender and other relevant social groups.

STRATEGY TO ACHIEVE SOCIAL DEVELOPMENT OUTCOMES AND ENGAGEMENT

Identify the appropriate social development outcomes of the project and propose a social development strategy, including recommendations for institutional arrangements to achieve them, based on the findings of the social assessment. The social development strategy could include measures that:

- Strengthen social inclusion by ensuring that both poor and excluded groups and intended beneficiaries are included in the benefit stream and in access to opportunities created by the project (i.e., a social inclusion framework);
- Empower stakeholders through their participation in the design and implementation of the project, their access to information, and their increased voice and accountability (i.e., a participation framework); and
- Enhance security by minimizing and managing likely social risks and increasing the resilience of intended beneficiaries and affected persons to socioeconomic shocks (i.e., a risk management framework).

Additionally, the strategy should address broader questions of social sustainability, by assessing the resilience of project benefits, institutional mechanisms, etc., to risks over time and how well-integrated the approach is into the larger set of development interventions in the country and sector in order to minimize inconsistencies and take advantage of potential synergies.

The social development strategy is expected to increase the benefits to the poor and vulnerable as well as reduce social and political risks that could undermine the gains of development, thereby increasing the equity and social sustainability of projects.

IMPLICATIONS FOR ANALYSIS OF ALTERNATIVES

Review the proposed approaches for the project and compare them in terms of their relative impacts and social development outcomes. Consider what implications the findings of the social assessment might have on those approaches. If the social analysis and consultation process indicates that alternative approaches are likely to have better development outcomes, such alternatives should be described and considered, along with the likely budgetary and administrative effects these changes might have.

RECOMMENDATIONS FOR PROJECT DESIGN AND IMPLEMENTATION ARRANGEMENTS

Provide guidance to Project Team and other stakeholders on how to integrate social development issues into project design and implementation arrangements. As much as possible, suggest specific action plans or implementation mechanisms to address relevant social issues and potential impacts. These can be developed as integrated or separate action plans, for example, as Resettlement Action Plans, Indigenous Peoples Development Plans, Community Development Plans, etc.

DEVELOPING A MONITORING PLAN

Through the social assessment process, a framework for monitoring and evaluation should be developed. To the extent possible, this should be done in consultation with key stakeholders, especially beneficiaries and affected people. The framework shall identify expected social development indicators, establish benchmarks, and design systems and mechanisms for measuring progress and results related to social development objectives. The framework shall identify organizational responsibilities in terms of monitoring, supervision, and evaluation procedures.

When possible, the following participatory monitoring mechanisms shall be incorporated:
- Establish a set of monitoring indicators to track the progress achieved. The benchmarks and indicators should be limited in number and should combine both quantitative and qualitative types of data. The indicators should include outputs to be achieved by the social development strategy; indicators to monitor the process of stakeholder participation, implementation, and institutional reform; indicators to monitor social risk and social development outcomes; and indicators to monitor impacts of the project's social development strategy. It is important to suggest mechanisms through which lessons learned from monitoring and stakeholder feedback can result in changes to improve the operation of the project. Indicators should be of such a nature that results and impacts can be disaggregated by gender and other relevant social groups.
- Define transparent evaluation procedures. Depending on context, these

may include a combination of methods, such as participant observation, key informant interviews, focus group discussions, census and socioeconomic surveys, gender analysis, Participatory Rural Appraisal (PRA), Participatory Poverty Assessment (PPA) methodologies, and other tools. Such procedures should be tailored to the special conditions of the project and to the different groups living in the project area.

- Estimate resource and budget requirements for monitoring and evaluation activities, and describe other inputs (such as institutional strengthening and capacity building) needed to carry it out.

EXPECTED OUTPUTS, SCHEDULE, AND REPORTING

Prepare a detailed schedule of the assessment activities described in the ToR. Explain what kinds of outputs the social assessment plans to produce, and note when the Project Team will give preliminary and final drafts of each output to the Environment and Social Safeguards Coordinator. Include relevant charts and graphs, statistical and qualitative analysis, and, in some cases, raw data obtained during the assessment.

In addition to the outputs of the assessment, include a note on the process itself, stating any difficulties faced by the team in conducting the assessment, and recommend the most appropriate dissemination strategy for the findings. Provide the report and accompanying materials in English.

CONSULTANT TEAM

This type of assessment usually requires a multidisciplinary consultant team to meet the different demands of the assignment. The ToR should specify key positions on the team. Individual time requirements should be specified for each assignment. One team member should be appointed team leader and be responsible for the team's performance.

Guidance on Analysis of Alternatives

3.1 Introduction

As part of an ESIA, WWF will assess feasible investment, technical, and siting alternatives, including the "no-action" alternative. Assessment of alternates will be undertaken, in particular, to help ensure that projects avoid, minimize, and/or mitigate any potential adverse social or environmental effects, including avoiding or minimizing involuntary resettlement, ensuring that indigenous peoples do not suffer adverse effects, fostering full respect for their rights, and promoting culturally appropriate social and economic benefits. The starting point for analysis of alternatives is the overall project objective.

Alternatives that will meet the objective should be identified with as much freedom from limiting conditions as possible, consistent with maintaining reasonableness and practicality. This is fundamental; it fosters the kind of creative planning needed to reveal options that are truly different, not only in terms of environmental and social impact, but also in cost and ease of implementation. It also sends a message to potentially affected communities and other interest groups that decisions still remain open in the areas usually of most concern to them, in contrast to cases in which the nature of the project and its location have already been decided.

3.2 Identifying Alternative Strategies

It is recommended that alternative strategies be identified generically, without reference to project locations. The identification of alternative strategies may relate to the entire project or specific components. At this stage it is important to consult with key stakeholders, including indigenous peoples, community organizations, relevant government institutions, agencies, and NGOs, on whether the range of strategies being considered is complete. Having defined a range of strategies, "resource requirements" should be determined for each alternative. All phases of the project should be considered.

Screening of alternative strategies helps limit the efforts and costs associated with data collection and processing. Screening should be based on factors such as ability of the strategy to meet the project objectives, availability of resource requirements, suitability in a particular situation, ability to minimize or avoid resettlement, and the broad environmental, social, and economic acceptability. The lead times associated with bringing projects on-line are also important in determining the suitability of alternatives. The screening process should define a realistic range of alternatives for further consideration. At this stage, a consultation exercise involving key stakeholders could take place in order to seek consensus on the short-listed strategies.

3.3 Identifying Alternative Locations

Having identified a short list of alternative strategies, the next stage is to identify a range of alternative locations. It may be appropriate to identify alternative locations for the entire project or selected components of the project. In many instances, some elements of the project may be fixed. However, this still leaves scope for analysis of alternative sites for other project components. Identification of suitable alternative locations should take into consideration the resource requirements identified for the short-listed strategies. The basis for screening alternative locations is similar to that used for screening strategies and includes ability to meet project objectives, resource requirements for short-listed strategies, and broad environmental planning and economic considerations, with particular emphasis on the opportunity to avoid or minimize resettlement. For example, reasons for rejection of alternative locations could include conflict with existing planning policies or settlements, encroachment into conservation areas or habitat of endangered species, disturbance of archaeologically important sites, and risks to groundwater. Significant social concerns, such as involuntary resettlement, often form the basis for rejection of locations. During the initial screening of alternative locations, the concerns of the wider public may be represented by government agencies, institutions, community organizations, or NGOs.

3.4 Evaluating Alternatives

Once the short list of alternative project proposals (or project element proposals) is finalized, an evaluation of each alternative should be undertaken. Environmental, social, and health impacts of the short-listed alternatives should be determined in sufficient detail to facilitate their comparative assessment. Institutional issues should be addressed concurrently and factored into the evaluation. Where possible, external environmental costs that have not previously been accounted for should be evaluated and internalized within the overall economic analyses. Integration of externalities can either be achieved by direct monetary valuation or by the use of comparative assessment techniques described below. The latter can be used to account for environmental, health, or social impacts that do not readily lend themselves to monetary valuation, such as loss of biodiversity. In many cases, the evaluation can be carried out with little fieldwork other than site reconnaissance and review of existing information sources, such as documentation on performance of technologies or methods, aerial photographs and satellite imagery, geological and soil surveys, and hydrologic records. However, the consultant team preparing the ESIA report should obtain missing information that it determines will be critical in discriminating among alternatives.

During evaluation, the process of public consultation should be continued to ensure that decision makers and stakeholders (including those at the individual sites) have confidence in the process. As a first step, stakeholders should be identified based on a review of the institutions or agencies that may become involved in implementation of project activities, NGOs, and community groups local to the short-listed sites. Consultation should entail clearly presenting alternatives to all parties, in the local language(s), in a forum that encourages discussion.

The final stage is to compare alternatives based on the output from the evaluation. In all cases, the basis for selection of the preferred alternative(s) should be transparent and clearly described.

3.5 "No-action" Alternative

The "no-action" or "no-project" alternative should routinely be included in analysis of alternatives in the ESIA report. This involves projecting what is likely to occur if proposed projects are not undertaken. It provides the means to compare the environmental, social, and economic impacts of various project alternatives with those of a scenario in which the project is not implemented. In evaluating the no-action alternative, it is important to take into account all probable public and private actions that are likely to occur in the absence of the project.

Conducting a truly objective evaluation of the no-action alternative requires extra care, since various interest groups have historically used it to support positions for and against projects. A balanced evaluation can provide objective guidance to support informed decision-making.

3.6 Data Requirements

An analysis of alternatives is dependent on the availability of sufficient data. The database must be designed so that the data describes the characteristics of the variables to be compared and to allow data to be transformed and aggregated satisfactorily at the different stages of the analysis process. Ideally, the data should be as homogenous as possible—collected in a methodologically consistent manner, representative for the time of project planning and implementation, and collected to comparable standards of accuracy. In general, the investment in collecting and processing data must be relative to the benefit of its application. Existing data sources should be used wherever possible, particularly in the earlier stages of analysis, subject to their efficacy.

3.7 Public Involvement

Providing opportunities for stakeholders to express their views during an alternatives analysis can be beneficial in two ways: to obtain information and to build consensus. First, some stakeholders will be sources of valuable local knowledge; others may be experts, and stakeholders in general are the main source of information on acceptability of certain alternatives. Second, participation throughout identification of the alternatives that will be considered, as well as during their evaluation and comparison, helps build consensus for the preferred alternative. Consensus-building is particularly important in operations like integrated conservation and development projects that depend on stakeholders for successful implementation. In a straightforward, noncontroversial project, the general public consultation process for the ESIA report may be sufficient. When a project is potentially controversial, however, it is advisable to focus additional consultation efforts on the analysis of alternatives, primarily for consensus-building.

3.8 Comparative Assessment of Alternatives

The objective of comparative analysis is to sharply define the merits and demerits of realistic alternatives, thereby providing decision makers and the public with a clear basis for choosing between options. The key challenge in comparative assessment is to show distinctions objectively, and as simply as possible. The adoption of unnecessarily complicated techniques can confuse decision makers and exclude the public from effective participation. As a general rule, the following principles should be adopted in determining an appropriate comparative assessment methodology: In every case, a table or matrix should be prepared summarizing qualitative or quantitative information for each option with decision criteria (economic, technical, environmental, and social) on one axis and options on the other. In all cases that involve involuntary resettlement, summary information on involuntary resettlement is summarized as a stand-alone criterion in the table or matrix. In many cases, particularly where only a few alternatives have been generated, a preferred alternative will become apparent by inspection of the matrix. Where the environmental or social impacts are broadly similar for each option, technical or economic factors should determine the preferred alternative. Where a larger number of realistic alternatives have been generated or where options have varying levels of impact, it may not be possible to identify a preferred alternative from the matrix. The matrix should still be prepared, since it enhances transparency of the process and provides the information that other reviewers of the analysis will need if they wish to check its conclusions or apply their own methods to compare alternatives. However, a more systematic approach may be needed, involving the use of multi-attribute decision-making techniques. More complex techniques and associated sensitivity analyses should be used only if straightforward methods fail to provide a clear basis for decision-making.

Systematic approaches to comparative assessment of alternatives involve the application of scaling, rating, or ranking checklists. These are used in conjunction with the results derived from the comparative evaluation of selected alternatives. Importance-weighting of decision criteria may also be used, either in isolation from or in combination with scaling, rating, or ranking methods. Ranking entails ordering alternatives from best to worst in terms of potential impacts on decision criteria. Rating refers to the use of a predefined rating scheme to rate the significance of decision criteria for each option. Scaling involves the assignment of numeric or algebraic scales to the impact of each alternative on each decision criterion. Importance-weighting involves assigning a weighting factor to each decision criterion relative to the other decision criteria. Explanations on the various techniques, and their limitations, may be obtained from the body of literature on environmental and social assessment methods.

Guidance on Developing an Environment and Social Management Plan

4.1 Introduction

The ESMP serves as a framework for managing and mitigating the environmental and social risks and impacts associated with implementing a project. Its content will depend on the extent to which issues have been identified. If issues are not yet clearly identified, the ESMP will lay out principles and criteria for project design, while leaving more specific measures to be finalized once the assessments have been conducted. Conversely, if safeguards issues and activities are already identified while the proposal is still being prepared, the ESMP should include summaries of detailed safeguard plans.

To prepare a management plan, the Project Team and Environment and Social Safeguards Coordinator will: (a) identify the set of responses to potentially adverse impacts; (b) determine requirements for ensuring that those responses are made effectively and in a timely manner; and (c) describe the means for meeting those requirements. More specifically, the ESMP includes the following components:

4.2 ESMP Template

PROJECT DESCRIPTION

This component includes a comprehensive description of the project, using the best available information for the project site. The project description must include at a minimum the following information:

- Location and geographic extent of the project;
- Description of relevant sociocultural, institutional, historical, legal, and political context;
- Description of the biophysical context, including details accounts of the species, habitats, ecosystems, and ecosystem services found in the project area;
- Description of existing physical cultural resources or sites where they may be present;
- Description of the institutional, policy, and conflict management arrangements in place to secure local stakeholders' involvement in the management of natural and cultural resources of the project area; and
- Description of the type and extent of project activities, including project length, implementation schedule and sequence, available financial and human resources, expected implementation arrangements, etc.

For community-based forest or natural resources management projects, the following additional information must be provided:

- Description of the type of uses and dependency of local livelihoods on forest or other natural resources in the project and adjacent area; and
- Description of forest or other natural resources products and ecosystems services relevant to local people living in or near forests or other natural ssytems in the project area, as well as opportunities for promoting the involvement of women.

MITIGATION

The ESMP identifies feasible and cost-effective measures that may reduce potentially significant adverse environmental impacts to acceptable levels. The plan includes compensatory measures if mitigation measures are not feasible, cost-effective, or sufficient. Specifically, the ESMP:

• Identifies and summarizes all anticipated significant adverse environmental impacts (including those involving indigenous peoples or involuntary resettlement);

• Describes, with technical details, each mitigation measure, including the type of impact to which it relates and the conditions under which it is required (e.g., continuously or in the event of contingencies), together with designs, equipment descriptions, and operating procedures, as appropriate; and

• Estimates any potential environmental and social impacts of these measures and provides linkage with any other mitigation plans (e.g., for involuntary resettlement or indigenous peoples) required for the project.

MONITORING

Environmental and social monitoring during project implementation provides information about key environmental and social aspects of the project, particularly the environmental and social impacts of the project and the effectiveness of mitigation measures. Such information enables the Project Team and Environment and Social Safeguards Coordinator to evaluate the success of mitigation as part of project supervision and allows corrective action to be taken when needed. Therefore, the ESMP identifies monitoring objectives and specifies the type of monitoring, with linkages to the impacts assessed in the ESIA report and the mitigation measures described in the ESMP. Specifically, the monitoring section of the ESMP provides a specific description and technical details of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions.

CAPACITY DEVELOPMENT AND TRAINING

To support timely and effective implementation of project components, the ESMP draws on the ESIA's assessment to identify capacity to carry out project components. If necessary, the ESMP identifies gaps in this capacity, and the training of staff, to allow implementation of ESIA recommendations. Specifically, the ESMP provides a specific description of institutional arrangements and who is responsible for carrying out mitigation and monitoring measures.

IMPLEMENTATION SCHEDULE AND COST ESTIMATES

For all three aspects (mitigation, monitoring, and capacity development), the ESMP provides (a) an implementation schedule for measures that must be carried out as part of the project, showing the sequence and coordination with overall project implementation plans; and (b) the capital and recurrent cost estimates and sources of funds for implementing the ESMP. These figures are also integrated into the total project cost tables.

INTEGRATION OF ESMP WITH THE PROJECT

The Project Team's decision to proceed with a project and WWF's decision to support it are predicated in part on the expectation that the ESMP will be executed effectively. Consequently, WWF expects the plan to be specific in its description of the individual mitigation and monitoring measures and its assignment of institutional responsibilities, and it must be integrated into the project's overall planning, design, budget, and implementation. Such integration is achieved by establishing the ESMP within the project so that the plan will receive funding and supervision along with the other components.

PROJECT-LEVEL MANAGEMENT PLANS

Environmental and Social Management Plan (ESMP)

The ESMP is a document that identifies a set of mitigation, management, monitoring, and institutional actions to be implemented. The ESMP addresses any potential adverse environmental and social impacts.

Involuntary Resettlement Action Plan (RAP) or Process Framework

The RAP is a document that specifies the procedures that the Executing Agency will follow and the actions that will be taken to properly resettle and compensate affected people and communities. The Process Framework describes the procedure to be developed during the project implementation to determine, develop, and implement a RAP. Both the RAP and Process Framework address safeguards related to Involuntary Resettlements or Restrictions of Access to Natural Resources.

Indigenous Peoples Plan (IPP)

The main objective of an IPP is to avoid adverse impacts on indigenous peoples, provide them with culturally appropriate social and economic benefits, and ensure that their rights to free, prior, and informed consent (FPIC) are respected. The IPP describes all potential negative impacts that a project may have on indigenous peoples and the measures that the Executing Agency will put in place to avoid and/or mitigate these impacts. The IPP addresses safeguards related to Indigenous Peoples.

Pest Management Plan (PMP)

The PMP describes measures to be implemented to avoid or minimize the negative impacts that the control and removal of alien and invasive species and the use of pesticides, insecticides, and herbicides may have on the environment and the people to be affected by these activities. The PMP addresses safeguards related to Pest Management.

Guidelines for the Implementation of the Policy on Protection of Natural Habitats

5.1 Introduction

This policy reflects the objectives of the Convention on Biological Diversity (CBD)[20] to conserve biological diversity and promote the sustainable management and use of natural resources. It also aligns with the Ramsar Convention on Wetlands,[21] the Convention on the Conservation of Migratory Species of Wild Animals,[22] the Convention on International Trade in Endangered Species of Wild Flora and Fauna,[23] the World Heritage Convention,[24] and the United Nations Convention to Combat Desertification.[25]

Its recommendations also align with the International Plant Protection Convention,[26] which covers the movement of invasive alien species, pests, and pest risk analysis for quarantine pests, including analysis of environmental risks and living modified organisms.

The specific objectives of this policy are to:
- Conserve biological diversity and ecosystem integrity by avoiding or, if avoidance is not possible, reducing and minimizing adverse impacts on biodiversity;
- Repair or restore adverse impacts on biodiversity, including, where impacts are unavoidable, through implementing biodiversity offsets to achieve a net gain for biodiversity conservation;
- Protect natural, modified, and critical habitats (natural and modified); and
- Sustain the availability and productivity of priority ecosystem services to maintain benefits to the affected communities and sustain project performance.

Its applicability is established during the implementation of the SST.

This applies to projects that:
- Are located in areas providing ecosystem services[27] upon which potentially affected stakeholders are dependent for survival, sustenance, livelihood, or primary income, or which are used for sustaining the project; and
- Involve the extraction of renewable natural resources as a main purpose (e.g., plantation forestry, commercial harvesting, agriculture, livestock, fisheries, and aquaculture).

5.2 Definitions

In the Project Location section of the SST, please note that this tool follows the following definitions of "natural habitats," "modified habitats," "critical natural habitats," and "degradation":
- **Natural habitats:** Land and water areas where (i) the ecosystems' biological communities are formed largely by native plant and animal species, and (ii) human activity has not essentially modified the area's primary ecological functions. All natural habitats have important biological, social, economic, and existence value. Important natural habitats may occur in tropical humid, dry, and cloud forests; temperate and boreal forests; Mediterranean-type shrublands; natural arid and semi-arid lands; mangrove swamps, coastal

marshes, and other wetlands; estuaries; sea grass beds; coral reefs; freshwater lakes and rivers; alpine and sub-alpine environments, including herb fields, grasslands, and páramos; and tropical and temperate grasslands.

- **Critical habitats:** Natural or modified habitats that have a high biodiversity value; they include the following:
  - ○ Habitats important to critically endangered and footprint-impacted species;
  - ○ Habitats of significant importance to endemic and/or restricted-range species and subspecies;
  - ○ Habitats of significant importance to globally significant concentrations of migratory species and/or congregator species;
  - ○ Regionally significant and/or highly threatened or unique ecosystems;
  - ○ Areas that are associated with key evolutionary processes;
  - ○ Areas that are important to species that are vital to ecosystems, such as keystone species;
  - ○ Areas that supply ecological networks; and
  - ○ Conservation-worthy habitats that have received formal protection as local, provincial, or national conservation areas.

Note that critical habitats can include areas that are not being protected or managed, and they may be outside legally protected and designated areas. Habitats may be considered critical if their ecosystem functions or species rely on or provide connectivity with other critical habitats, including legally protected critical habitat areas. WWF does not implement projects in critical habitats that have been, or will be, downgraded merely to allow the project to proceed.

- **Modified habitats:** Habitats whose primary ecological functions have been significantly altered by human activities and whose original species composition, richness, and abundance have been reduced, with evidence of colonization by non-native species of flora and fauna.
- **Degradation:** Modification of a critical or other natural habitat that substantially reduces the habitat's ability to maintain viable populations of its native species and environmental functions.

As part of the Policy on Environment and Social Risk Management, the Project Team identifies and assesses the potential opportunities for, risks to, and impacts on biological diversity and ecosystem services, including direct, indirect, cumulative, and pre-mitigation impacts.

To ensure objectivity and accuracy, the determination as to whether a habitat is natural, modified, or critical is made in consultation with the Environment and Social Safeguards Coordinator, and takes into account designations by national and local authorities.

For projects that are being developed in natural habitats, modified habitats with high conservation value,[28] critical habitats, or legally protected areas, the Project Team incorporates the best available science and engages recognized and experienced biodiversity experts in conducting the impact assessment and in developing and implementing mitigation and management strategies.

If the project is to take place in or near a natural or critical habitat, or near a legally protected or internationally recognized area, the assessment considers the potential risks and impacts that may occur at the landscape or seascape level.

The Project Team obtains the advice of and uses recognized experts to assess biodiversity and ecosystem services values associated with natural habitats—for example, cultural, aesthetic, spiritual, educational, and recreational values—identified by potentially affected community members, experts, and other stakeholders.

5.3 Biodiversity Offsets

The Project Team applies **the mitigation hierarchy**[29] to avoid potentially adverse impacts; if avoidance is not possible, to reduce and minimize potential adverse impacts; if reduction or minimization is not sufficient, to mitigate and/or restore; and, as a last resort, to offset.

In all projects, the Project Team ensures that the project will not cause significant modification of natural habitats, except when:
- There are no technically and cost-effective viable alternatives to implementing the project in the natural habitat; and
- The biodiversity mitigation hierarchy has been properly implemented and appropriate mitigation measures have been designed for conservation benefit; and
- The opinions and concerns of affected communities, as identified through the consultation process, have been addressed in the design of the mitigation measures.

If projects are to be developed in natural habitats, or are to have potential adverse downstream impacts on natural habitats, they must include mitigation measures to achieve either net benefit or no net loss of biodiversity—for example, ecological restoration of habitats, actions to reduce fragmentation, and restoration of ecosystem functioning. As a last resort, this can be done by the development of a biodiversity-offset program, in accordance with **WWF policy on Biodiversity Offsets**.[30] When considering biodiversity offsets, the Project Team uses a landscape-/seascape-scale[31] planning process to identify the most environmentally sound approach.

WWF may agree to implement a project in a critical habitat if the Project Team can demonstrate, using appropriate measurement and monitoring methods, that:
- The mitigation hierarchy has been used in the project design;
- The project provides clear benefits and positive outcome for biodiversity and ecosystem services;
- The project-related activities will not have adverse effects (direct, indirect, or cumulative) on the criteria by which the critical habitat was designated;
- The project will not have any negative effects on critically endangered or endangered species;
- The project will achieve the previous two points without offsets or a "net gain" analysis; and
- A robust, appropriately designed and funded, long-term biodiversity monitoring and evaluation program is integrated into (i.e., provides feedback into) the project management program.

Offset is considered in the mitigation hierarchy as a last resort; it is implemented in a critical habitat only if the parameters for which the area is classified as critical are not involved.

Any assessment and/or planning by the Project Team with respect to critical habitat must meet the following conditions:
- It is developed on a case-by-case basis in consultation with recognized experts.
- Before the project commences, it uses adequate baseline data to assess the dimensions of the study area and describe relevant physical, biological, and socioeconomic conditions, including the current status of the critical habitat and critically endangered or endangered species and any changes anticipated.
- It reflects the conservation plans of relevant governments and regional and/ or international bodies.
- It uses a landscape/seascape analysis.

When the habitat/biodiversity implications of a project would appear to be particularly severe, WWF may decide not to implement the project.

5.4 Legally Protected Areas and Internationally Recognized Areas
Where national regulations permit a project on legally protected areas or internationally recognized areas (e.g., World Heritage Areas) or on areas that are proposed for protection or international recognition, the Project Team must comply with national and local regulations for appropriate environmental management, and consults with relevant stakeholders during the preparation of management and mitigation measures. The Project Team must ensure that any proposed development is consistent with the area's management plan or, in the absence of a management plan, with the objectives determined by the responsible natural resource, protected area, or wildlife agency.

5.5 Invasive Alien Species
The Project Team must take precautions to avoid introducing any potentially invasive alien species (that is, species not currently established in the country or region of the project).

Under no circumstances are species known to be invasive introduced into new environments. The Project Team assesses the possibility of accidental or unintended introduction of invasive alien species, and identifies measures to minimize the potential for release.

If invasive alien species already exist in the area, the Project Team does not undertake activities that may enhance their competitiveness in comparison with indigenous species or promote their spread. The Project Team assesses the feasibility and cost-effectiveness of eradicating the invasive alien species.

Guidelines for Involuntary Resettlement and Restriction of Access to Natural Resources

6.1 Introduction

This annex outlines the requirements necessary to avoid involuntary resettlement, minimize other project-initiated resettlement, and mitigate social impacts from restrictions of access to natural resources in protected areas as per the WWF Network's Policy on Involuntary Resettlement. When indigenous peoples are affected, this should be applied together with WWF's Policy on Indigenous Peoples.

The objective of this section is to avoid, minimize, or mitigate potentially adverse effects of resettlement and of other restrictions of access to natural resources, and ensure that affected communities are consulted with and that they participate in meaningful ways in and give consent to project activities affecting them. The following elements are covered:
- Project Procedural Requirements
- Preparation and Contents of a Resettlement Instrument
- Additional Guidance
- WWF Policy Requirements
- WWF's Procedures on Compensation, Assistance, and Benefits for Involuntary Resettlement

6.2 Applicability

WWF's policies on Involuntary Resettlement are applicable to all components of the project that result in involuntary resettlement. It also applies to other activities resulting in involuntary resettlement that, in the judgment of WWF, are:
- Directly and significantly related to the WWF project;
- Necessary to achieve its objectives as set forth in the project documents; and
- Carried out, or planned to be carried out, contemporaneously with the project.

6.3 Project Procedural Requirements

6.3.1 Early Project Development

When a proposed project is likely to involve involuntary resettlement, the Project Team will informs the Environment and Social Safeguards Coordinator and other project partners, including project-affected people, and will then:
- Assess the nature and magnitude of the social and economic impact of the project, including any displacement or restriction of access to economic or social assets;
- Explore all viable alternative project designs to avoid, where feasible, or minimize displacement;
- Assess the legal framework covering resettlement and the policies of the government and implementing agencies;
- Review experience with similar operations;
- Discuss with those responsible for resettlement the policies and institutional, legal, and consultative arrangements for resettlement, including measures to address any inconsistencies between Government or Executing Agency and WWF's Policy on Involuntary Resettlement; and
- Discuss any technical assistance to be provided.

For projects with impacts that include the involuntary taking of land resulting in relocation or loss of shelter; loss of assets or access to assets; or loss of income sources or means of livelihood, whether or not the affected persons must move to another location (referenced below as **Category A** impacts), the Project Team assesses the following during project preparation:

• The potential social and economic impacts of the projects;
• The extent to which project design alternatives and options to minimize and mitigate involuntary resettlement have been considered;
• Progress in preparing the Resettlement Plan or Resettlement Policy Framework and its adequacy, including the involvement of affected groups and the extent to which the views of such groups are being considered;
• Proposed criteria for eligibility of displaced persons for compensation and other resettlement assistance;
• The feasibility of the proposed resettlement measures, including provisions for sites if needed; funding for all resettlement activities, including provision of counterpart funding on an annual basis; the legal framework; and implementation and monitoring arrangements; and
• If sufficient land is not available in projects involving displaced persons whose livelihoods are land-based and for whom a land-based resettlement strategy is the preferred option, the evidence of lack of adequate land.

For projects with impacts involving the involuntary restriction of access to legally designated parks and protected areas resulting in adverse impacts on the livelihoods of the displaced persons (referenced below as **Category B** impacts), the Project Team assesses the following during project preparation:

• The extent to which project design alternatives and options to minimize and mitigate involuntary resettlement have been considered; and
• Progress in preparing the Process Framework and its adequacy, including the adequacy of the proposed participatory approach; criteria for eligibility of displaced persons; funding for resettlement; the legal framework; and implementation and monitoring arrangements.

On the basis of the assessments above, the Project Team shall consult project-affected people, in a culturally appropriate, inclusive manner and in relevant local fora.

Based on the review of relevant resettlement issues and the steps identified above, the Project Team agrees with appropriate stakeholders, including project-affected peoples and communities included in the above-referenced consultation, on the type of resettlement instrument (Resettlement Plan, Abbreviated Resettlement Plan, Resettlement Policy Framework, or Process Framework) and the scope and the level of detail required. The Project Team conveys these decisions to the Environment and Social Safeguards Coordinator and also discusses with them the actions and consultations necessary to prepare the resettlement instrument.

Informed by these consultations with project stakeholders, the Project Team shall develop the resettlement instrument. The content of a resettlement instrument is discussed below in the "Guidance on Preparation of a Resettlement Instrument" section of this document. Upon its completion, the Project Team should ensure that the resettlement instrument is disclosed to key project stakeholders,

including project-affected groups and local CSOs, in a form and language understandable to them.

As an initial step to planning for involuntary resettlement, national laws should be identified. In particular, this should include:
- Whether the national law recognizes the persons with no legal rights (such as squatters, people who have no land titles but who claim they have been on land by tradition or by their ancestors, or people who occupied or lived on public land for a long time and were not requested by the government to leave); and
- Where the national law recognizes these persons with no legal rights, whether the procedures developed by the government provide them with resettlement assistance to help restore or improve their livelihood instead of land compensation.

6.4 Project Finalization

The Project Team submits a resettlement instrument (e.g., a Resettlement Plan, a Resettlement Policy Framework, or a Process Framework), as a condition of appraisal for projects involving involuntary resettlement. Once the Project Team officially transmits the draft resettlement instrument to the Safeguards Coordinator, the Safeguards Coordinator will review the instrument and determine whether it complies with WWF's SIPP. Once the resettlement instrument has been approved, it will be publicly disclosed in compliance with WWF Public Consultation and Disclosure (See chapter on **Public Consultation and Disclosure**).

During project concept finalization, WWF will assess (a) the Executing Agency's commitment to and capacity for implementing the resettlement instrument; (b) the feasibility of the proposed measures for improvement or restoration of livelihoods and standards of living; (c) availability of adequate counterpart funds for resettlement activities; (d) significant risks, including risk of impoverishment, from inadequate implementation of the resettlement instrument; and (e) the adequacy of arrangements for internal and, if considered appropriate by WWF, independent monitoring and evaluation of the implementation of the resettlement instrument.

6.5 Project Implementation

The project ensures that displacement or restriction of access does not occur before necessary measures for resettlement are in place. For **Category A** impacts covered in these guidelines, these measures include provision of compensation and of other assistance required for relocation, prior to displacement, and preparation and provision of resettlement sites with adequate facilities, where required. In particular, taking of land and related assets may take place only after compensation has been paid and, where applicable, resettlement sites and moving allowances have been provided to the displaced persons. For **Category B** impacts, the measures to assist the displaced persons are implemented in accordance with the plan of action as part of the project.

Payment of cash compensation for lost assets may be appropriate where (a) livelihoods are land-based but the land taken for the project is a small fraction of the affected asset and the residual is economically viable; (b) active markets for land, housing, and labor exist, displaced persons use such markets, and there is

sufficient supply of land and housing; or (c) livelihoods are not land-based. Cash compensation levels should be sufficient to replace the lost land and other assets at full replacement cost in local markets.

For **Category A** impacts, WWF also requires the following:
- Displaced persons and their communities, and any host communities receiving them, are provided timely and relevant information, consulted on resettlement options, and offered opportunities to participate in planning, implementing, and monitoring resettlement. Appropriate and accessible grievance mechanisms are established for these groups.
- In new resettlement sites or host communities, infrastructure and public services are provided as necessary to improve, restore, or maintain accessibility and levels of service for the displaced persons and host communities. Alternative or similar resources are provided to compensate for the loss of access to community resources (such as fishing areas or grazing areas).
- Patterns of community organization appropriate to the new circumstances are based on choices made by the displaced persons. To the extent possible, the existing social and cultural institutions of resettlers and any host communities are preserved and resettlers' preferences with respect to relocating in pre-existing communities and groups are honored.

6.6 Project Monitoring and Evaluation
All Resettlement Plans must be fully implemented before the project is formally concluded. Upon completion of the project, WWF will assess whether project-related resettlement measures have met their planned objectives. Projects should develop plans to incorporate project-affected communities in the implementation and monitoring of project-related resettlement activities.

6.7 Guidance on Preparation of a Resettlement Instrument
To address the impacts referenced above as Category A, the Project Team prepares a resettlement instrument, plan, or policy framework that covers the following:
- The Resettlement Plan or Resettlement Policy Framework includes measures to ensure that the displaced persons are:
  - informed about their options and rights pertaining to resettlement;
  - consulted on, offered choices among, and provided with technically and economically feasible resettlement alternatives; and
  - provided prompt and effective compensation at full replacement cost for losses of assets attributable directly to the project.
- If the impacts include physical relocation, the Resettlement Plan or Resettlement Policy Framework includes measures to ensure that the displaced persons are:
  - provided assistance (such as moving allowances) during relocation; and
  - provided with residential housing, or housing sites, or, as required, agricultural sites for which a combination of productive potential, locational advantages, and other factors is at least equivalent to the advantages of the old site.
- Where necessary to achieve the objectives of the policy, the Resettlement Plan or Resettlement Policy Framework also include measures to ensure that displaced persons are:

- offered support after displacement, for a transition period, based on a reasonable estimate of the time likely to be needed to restore their livelihood and standards of living; and
- provided with assistance in addition to compensation measures, such as land preparation, credit facilities, training, or job opportunities.

In projects involving involuntary restriction of access to legally designated parks and protected areas, the nature of restrictions, as well as the type of measures necessary to mitigate adverse impacts (referenced above as Category B), is determined with the participation of the displaced persons during the design and implementation of the project.

In such cases, the Project Team prepares a Process Framework acceptable to WWF, describing the participatory process by which:
- Specific components of the project will be prepared and implemented;
- The criteria for eligibility of displaced persons to receive compensation benefits and development assistance will be determined;
- Measures to assist the displaced persons in their efforts to improve their livelihoods, or at least to restore them, in real terms, while maintaining the sustainability of the park or protected area, will be identified; and
- Potential conflicts involving displaced persons will be resolved.

The Process Framework also includes a description of the arrangements for implementing and monitoring the process.

6.8 Additional Guidance

Based on preliminary assessments, the Project Team will consider support and promote alternative project designs that will:
- Take the least restrictive approach to address conflicts between local resource use patterns or trends and conservation objectives (e.g., modifying use of particular resources rather than broader restrictions on access to an area);
- Respect and protect the statutory and customary social, economic, and political rights of those affected, with particular attention to vulnerable groups, and ensure that enjoyment of basic rights (e.g., food) is not undermined;
- Provide benefits that are, at least, culturally and economically consistent with any losses incurred; and
- Include full consultation on the proposed actions, and result in voluntary agreements with affected people.

Through the above-mentioned measures, Project Teams will avoid or minimize involuntary resettlement—i.e., involuntary taking of land or involuntary restriction of access to legally designated parks and protected areas—by identifying, assessing, and addressing potential economic and social impacts of conservation activities and assessing all viable alternative project designs. In particular, in the case of any project involving restriction of access to legally designated parks and protected areas, WWF will (in addition to the measures above) design, document, and disclose a participatory process before appraisal for (a) preparing and implementing project components, (b) establishing eligibility for mitigation measures, (c) agreeing on mitigation measures that help improve or restore livelihoods in a manner that maintains the sustainability of the park or protected area, (d) resolving conflicts, and (e) monitoring implementation.

In limited circumstances where customary or statutory rights would not be adversely affected, viable alternatives have been sought but cannot be achieved, and capacity of relevant authorities is sufficient to carry out resettlement in a socially sound manner, WWF will ensure—as a condition for project support—that any involuntary resettlement measures comply with the following procedures:

- Persons to be resettled have opportunities to participate in the planning, implementation, and monitoring of the resettlement program, especially in the development and implementation of procedures for determining eligibility for compensation and development assistance, and for establishing grievance mechanisms;
- Particular attention is paid to the needs of vulnerable groups;
- Persons to be resettled are informed of their rights, consulted on options, and provided with technically and economically feasible resettlement alternatives and assistance, including:
    - ○ Compensation for loss of assets attributable to the project or, if there is relocation, assistance during relocation; and
    - ○ Preference for land-based resettlement strategies where livelihoods are land-based.
- Persons who have no recognizable legal right or claim to the land they are occupying are provided resettlement assistance in lieu of compensation for land, consistent with the objectives of this policy.
- Resettlement Plans and/or plans to address involuntary restriction on access to protected areas are disclosed in a timely manner, in a place and language accessible to key stakeholders, including project-affected groups and CSOs, before appraisal formally begins.
- Resettlement assistance is provided before displacement or restriction of access, and all Resettlement Plans are implemented prior to project completion. Assessment is carried out to determine achievement of resettlement objectives, upon completion of the project.

Particular attention should be paid to the needs of vulnerable groups among those displaced, especially those below the poverty line, the landless, indigenous peoples, ethnic minorities, or other displaced persons who may not be protected through national land compensation legislation.

Resettlement of indigenous peoples with traditional land-based modes of production is particularly complex and may have significant adverse impacts on their identity and cultural survival. For this reason, WWF satisfies itself that the Project Team has explored all viable alternative project designs to avoid physical displacement of these groups. When it is not feasible to avoid such displacement, preference is given to land-based resettlement strategies for these groups that are compatible with their cultural preferences and are prepared in consultation with them.

Preference should be given to land-based resettlement strategies for displaced persons whose livelihoods are land-based. These strategies may include resettlement on public land, or on private land acquired or purchased for resettlement. Whenever replacement land is offered, resettlers are provided with land for which a combination of productive potential, geographic advantages, and other factors is at least equivalent to the advantages of the land taken.

If land is not the preferred option of the displaced persons, the provision of land would adversely affect the sustainability of a park or protected area, or sufficient land is not available at a reasonable price, non-land-based options built around opportunities for employment or self-employment should be provided in addition to cash compensation for land and other assets lost. The lack of adequate land must be demonstrated and documented to the satisfaction of Environment and Social Safeguards Coordinator.

6.9 Guidance on Compensation, Assistance, and Benefits for Involuntary Resettlements

Compensation, assistance, and benefits are designed to enhance or at least restore the livelihoods of all displaced persons in real terms relative to pre-project levels and to improve the standards of living of the displaced poor and other vulnerable groups. Compensation for expropriated assets is a one-time undertaking. Assistance and benefits, on the other hand, continue over time to restore and improve income and living standards and necessitate continuing coordinated efforts by a number of agencies. WWF will follow its procedures on compensation, assistance, and benefits for involuntary resettlement for all GEF and GCF funded projects and others as necessary, referencing national laws as a baseline.

Where compensation, assistance, and benefits are socially and culturally compatible as well as economically feasible and sustainable, they must be allocated among the displaced persons in proportion to their losses and in relation to their needs if they are poor and vulnerable. For this purpose it is helpful to break down kinds of displaced persons and their eligibility for entitlements, assistance, and benefits.

As an initial step to planning for involuntary resettlement, national laws should be identified. In particular, this should include:
- Whether the national law recognizes the persons with no legal rights (such as squatters, people who have no land titles but who claim they have been on land by tradition or by their ancestors, or people who occupied or lived on public land for a long time and were not requested by the government to leave); and
- Where the national law recognizes these persons with no legal rights, whether the procedures developed by the government provide them with resettlement assistance to help restore or improve their livelihood instead of land compensation.

6.9.1 Eligibility for Compensation

A cut-off date for eligibility for compensation needs to be established early in the process to prevent a subsequent inflow of people into the affected area. This date will be established with the country government and could be the start of a census taken as part of the development of the Resettlement Action Plan.

A Resettlement Action Plan should address the compensation and rehabilitation measures for each type of displaced persons affected by a project. Compensation varies according to the type of displaced persons. Types of displaced persons include:
- Displaced persons with formal legal rights generally defined by the possession of individual freehold titles duly recorded in title registries and cadastral records in most countries.

- Displaced persons whose rights are not formal or legal but whose claims are recognized under national laws. In some countries the process of land ownership has not been fully formalized but there are people who have inherited, occupied, and utilized the land for generations who may not have titles simply because the state has not issued them. In other cases, traditional land tenure systems are based on usufruct right to lands held collectively. Hence, no state-issued individual titles may exist although in practice individual household usufruct rights are well recognized and regulated by a community or kinship group or the state. Resettlement planning for these displaced persons should include application of legal instruments to update land records prior to their displacement. Where juridical procedures are so slow as to make this impossible, other documentation such as tax receipts, electricity or telephone bills, testimony of village elders or town councils, and confirmation by neighbors may be proposed to determine eligibility for compensation, replacement land, a replacement house, or other resettlement assistance.
- Displaced persons without formal legal rights. This category includes squatters, tenants, sharecroppers, and wage laborers who depend on the land acquired. They have neither legal rights to the land nor recognizable ownership claims to the land but because land acquisition destroys their livelihoods they are considered displaced persons and are entitled to receive resettlement assistance.

6.9.2 Land-based and Non-land-based Compensation

Priority should be given to a land-based resettlement approach for displaced persons whose livelihoods are land-based. The land-based resettlement strategy means land-for-land replacement of lost assets and livelihoods. This approach is preferred because non-land-based options may render people whose livelihoods are based entirely on the land vulnerable. For agriculturalists, replacing land resources they have lost with new land of equal or better productive potential is almost always the best solution. Selecting appropriate resettlement sites is critical for restoration or enhancement of livelihoods. It should be based on technical feasibility studies of soil quality, slope, drainage, etc.; possibilities for technological improvement, including by irrigation; availability of pasture; and possibilities of continuing such productive activities as collection of non-timber forest products, fishing, and hunting. As a rule, if land is acquired from ethnic minority groups or indigenous groups that are dependent on agriculture, non-timber forest resources, and livestock, the compensation and livelihood restoration or enhancement assistance will be land-based.

If land is not the preferred option of the displaced persons and if the Project Team and partners believe that replacement land does not exist or is unaffordable, options not based on land may be considered. In the latter case, evidence must be presented to WWF to demonstrate that the conditions presented by the Project Team exist. Specialized land administration agencies and real estate specialists can be used in this process. In any case where the Project Team and partners propose to offer non-land resettlement options (such as capacity enhancement, employment, and other productive activities), presentation to WWF of documentation of consultations with and acceptance by the displaced persons is a requirement.

The compensation options not based on land replacement typically include cash for land or assets. To this can be added the creation of opportunities for employment or self-employment, including capacity enhancement. The non-land options may be necessary when replacement land of equal quality is not available or is unaffordable, or when the displaced persons make an informed decision to demand compensation in cash.

6.9.3 Compensation at Replacement Cost

WWF requires that compensation for the acquired land, housing, and other assets be made at full replacement cost. Full replacement cost is the cost of replacing an expropriated asset of the same or better quality in the current land and/or housing market. Full replacement cost includes the following elements:

- **Fair market value.** Where markets function, fair market value can usually be assessed by examining land sales records in the recent 3 or 4 years for similar properties. In some markets, however, sales records do not reflect real values because buyers and sellers often collude in reporting smaller sale values so that they can reduce taxes. In such cases, the market value is the going price of an asset in the open market between a willing seller and a willing buyer. Generally, real estate agents are the custodians of such information. Where markets do not exist, field investigations are needed to collect baseline data to value assets. In all of these cases, qualified, experienced experts must be engaged. The value to achieve the compensation objectives on farmlands is counted as part of a compensation package at replacement cost. In the absence of housing resale markets, the cost of constructing new houses can be accurately estimated to determine the fair market value.
- **Transaction costs.** Transaction costs may include the legal and documentation expenses associated with updating land records to reflect sales, transfers, and inheritances, as well as the legal and documentation expenses associated with registering property titles to replacement lands and houses. Transportation costs associated with these activities may also be included under the transaction costs. These costs will not be paid by the displaced person but by the project and are counted as part of replacement costs.
- **Interest accrued.** When there is a gap of time between the payment of compensation per schedule (as reflected in a Resettlement Action Plan, to be followed by the acquisition of land) and the actual payment of compensation by a borrower, the interest that accrues over that period must be included in the replacement costs.
- **Transitional and restoration costs.** Transitional cost involves a short-term subsistence allowance to support the displaced persons through a period of income loss due to a project. It may also include critical agricultural extension, training, and capacity-building programs. Restoration cost refers to necessary improvements on the land or to housing to achieve the objectives of enhancing, or at least restoring, livelihoods, compared with pre-project levels.
- **Other applicable payments.** In some but not all countries, premium or markup can also be considered part of the payments for replacement costs.
- **Depreciation not a factor.** WWF requires that the Project Team and partners do not consider depreciation of structures and assets when valuing compensation for expropriated built structures. It is also a good practice not to apply deduction for salvageable materials from the compensation amount, especially if the displaced persons are below the poverty line.

WWF requires that compensation be paid before physical or economic displacement, but it may take longer to fully implement some aspects of the Resettlement Action Plan, such as the income restoration program or even preparation of a resettlement site with housing and infrastructure—activities that may run parallel to the project's other construction activities.

It may also take several years to complete a project with significant impacts. Others may take only a few months and affect relatively few people. Whatever the case, if project implementation restricts land use or access to legally designated parks and protected areas, the timetable for involuntary resettlement planning for such restrictions should be commensurate with the magnitude, severity, and duration of social and economic impacts it is designed to mitigate houses and other structures.

6.9.4 Security of Land Tenure

Providing security of land tenure is one of the many measures that can help achieve the objective of Policy on Involuntary Resettlement. This is clearly an issue for displaced persons without title but it also applies to those with title inasmuch because it protects resettled persons from future forced evictions from resettlement sites. Security of tenure thus requires special attention. Options vary from country to country but may include:

• Individual ownership title deed;
• Communal titles;
• Credit in a pay-to-own scheme by a housing or land reform agency; and
• Long-term leases or occupancy arrangements.

6.9.5 Assistance for Physical Displacement

The assistance required by WWF for physical displacement includes relocation assistance, secured tenure to relocation land, better housing with accessibility to employment and production opportunities, transitional support and development assistance, and opportunities to derive development benefits. Relocation assistance may include support for transportation of people, belongings, livestock, equipment, and other movable property to the new settlement site. Resettlement assistance is broader in scope and includes relocation as well as transitional/ subsistence allowances of food, fodder, and fuel that may be needed until new production systems are working well. Registering property rights and issuing titles to new lands and houses is also part of transitional support. Transitional support may include provision of educational and health services until state or private suppliers resume services to the displaced persons. It also includes agricultural extension, training, and provision of initial inputs such as seeds and fertilizers. It also covers provision of tools and materials coupled with training in crafts or trades such as carpentry or plumbing.

6.15 Benefits for Physical Displacement

Opportunities to derive development benefits from a project refer to benefit sharing. This involves helping the displaced, particularly the displaced poor and the vulnerable groups, to share in the project's benefits. Benefit sharing is in addition to compensation and is intended to improve standards of living.
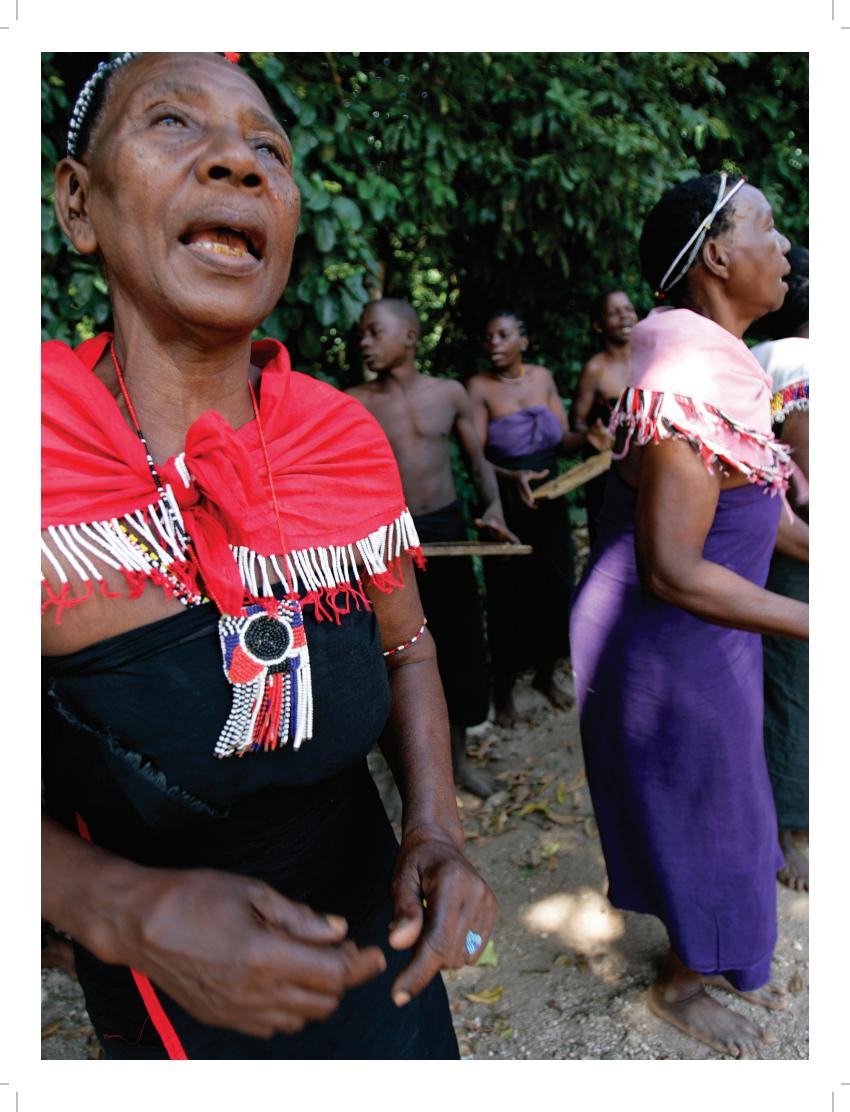
6.9.6 Assistance for Economic Displacement

Economically displaced persons can encompass those with title or recognizable title to land and those who are without title to land or who are landless. Assistance to economically displaced persons includes compensation at full replacement cost for the loss of income or livelihood sources—often called income restoration or livelihood support measures. These people depend directly on the land and are often the poorest and most vulnerable of a country's citizens. They can include sharecroppers, renters, tenants, and wage laborers, as well as artisans, shopkeepers, and small businesses occupying land they do not own. They are entitled to compensation for the loss of their income or livelihood sources at full replacement cost. Their lost assets may be crops, irrigation facilities, trees, livestock pens, fences, shops, and vendor stalls, among other things.

Resettlement assistance for such persons may include a subsistence allowance for food, fodder, and fuel until incomes are restored, and programmatic access to credit, training, and employment opportunities. For land acquisition affecting commercial structures, the resettlement assistance for the owners will include the cost of reestablishing the activities, net income lost during the period of inactivity, and the moving cost of materials. Shop owners who have a title to land or have recognizable title to land are also entitled to land or cash compensation at full replacement cost for the land where they carry out their commercial activities.

6.9.7 Benefits for Economic Displacement

Benefits for the economically displaced persons may include special innovative efforts to target the poor and vulnerable persons.

Procedures for Implementation of Indigenous Peoples Policy

7.1 Introduction

WWF recognizes the unique cultural and socioeconomic circumstances, historic and current vulnerability, place-based culture, and internationally recognized rights afforded indigenous peoples, as recognized under International Labor Organization's Convention No. 169 and the United Nations Declaration on the Rights of Indigenous Peoples.

Indigenous people are defined by ILO Convention No. 169 as: (a) tribal peoples in independent countries whose social, cultural and economic conditions distinguish them from other sections of the national community, and whose status is regulated wholly or partially by their own customs or traditions or by special laws or regulations; or (b) peoples in independent countries who are regarded as indigenous on account of their descent from the populations which inhabited the country, or a geographical region to which the country belongs, at the time of conquest or colonization or the establishment of present state boundaries and who, irrespective of their legal status, retain some or all of their own social, economic, cultural and political institutions. Self-identification as indigenous or tribal shall be regarded as a fundamental criterion for determining the groups to which the provisions of this Convention apply. WWF at minimum adheres to the ILO definition of indigenous people when determining if the Indigenous Peoples Policy should apply to projects, and will apply a more inclusive definition if determined appropriate

International instruments recognize the right to free, prior, and informed consent (FPIC) for indigenous/tribal peoples alone. However, in practice, the principles underlying FPIC are increasingly extended to local communities and project-affected communities, as well. This extension is consistent with the Convention on Biological Diversity (CBD), which recognizes that both indigenous and local communities have rights to FPIC. In short, FPIC has emerged as a best-practice standard for all project-affected communities.

In WWF's work, the processes of consultation and obtaining FPIC will be applied to all project-affected communities, with the distinction that indigenous peoples enjoy a higher standard of protection based on their vulnerability and place-based culture. Thus, for indigenous peoples, WWF would place greater priority on avoidance of adverse impacts compared with other local communities, for which mitigation or compensation may be more feasible without damage to the community. This section thus guides our work with all communities and outlines these best-practice standards consistent with WWF policies.

7.2 Applicability and Objectives

WWF's Statement of Principles on Indigenous Peoples and Conservation recognizes the distinct circumstances that expose indigenous peoples to different types of risks and impacts from development projects. As social groups with identities that are often distinct from dominant groups in their national societies, indigenous peoples are frequently among the most marginalized and vulnerable segments of the population. As a result, their economic, social, and legal status

often limit their capacity to defend their rights to lands, territories, and other productive resources, and restricts their ability to participate in, and benefit from, development.

At the same time, WWF recognizes that indigenous peoples play a vital role in sustainable development and emphasizes that conservation should benefit indigenous peoples, thereby ensuring long-term sustainable management of critical ecosystems and protected areas.

7.3 Project Risks to Indigenous Peoples

Many areas with threatened species and other biodiversity values overlap with lands or territories traditionally owned, customarily used, or occupied by indigenous peoples. In this way, WWF projects can provide valuable long-term opportunities for sustainable development for indigenous peoples and other local communities. On the other hand, projects supported by GEF and GCF could also adversely affect indigenous peoples and the lands and resources on which they depend. Potential impacts and risks may include the following (which are illustrative only and do not exclude other impacts in particular cases):

- Loss of customary rights to land and natural resource use areas as well as areas used for social, cultural, and spiritual purposes. Such rights would need to be identified and recognized in specific projects;
- Changes in land and natural resource use that do not take into consideration traditional resource use practices. Activities that support land and natural resource use changes based on unfounded assumptions that these are unsustainable may inflict both adverse social consequences (e.g., decreased food security) and environmental consequences (e.g., over-exploitation of remaining land use areas). Such activities should only be undertaken based on a thorough understanding of both biological and social evidence, and through consultations with indigenous peoples;
- Loss of culture and social cohesion. Given indigenous peoples' social and political marginalization and their distinct cultures and identities, which are often intertwined with their land and natural resource use practices, interventions may adversely affect their culture and social organization, whether inadvertently or not. While indigenous communities may welcome and seek change, they can be vulnerable when such change is imposed from external forces without their full participation and consent; and
- Inequitable benefits and participation. Given their social and political marginalization, indigenous peoples may not reap the benefits of conservation projects. The costs (e.g., in time and resources) of participating in project activities may also outweigh the benefits to indigenous peoples. Participation design may not include appropriate capacity building (when needed) or appropriate representation of indigenous peoples in decision-making bodies or may not take into consideration local decision-making structures and processes. This may lead to alienation of indigenous peoples or conflicts with and/or between communities.

7.4 Indigenous Peoples Safeguard Requirements

WWF's Policy on Indigenous Peoples applies to projects that affect indigenous peoples, whether adversely or positively. Such projects need to be prepared with care and with the participation of affected communities.

Policy requirements include early screening for indigenous peoples; an environmental and social impact assessment with the participation of indigenous peoples to assess risks and opportunities and to improve the understanding of the local context and affected communities; a consultation process with the affected indigenous peoples' communities to fully identify their views and to obtain their free, prior, and informed consent to project activities affecting them; and development and inclusion of the elements of a project-specific Indigenous Peoples Plan (IPP) with measures to avoid adverse impacts and enhance culturally appropriate benefits in each project.

The level of detail necessary to meet the requirements of this planning framework is proportional to the complexity of the proposed project and commensurate with the nature and scale of its potential effects on the indigenous peoples, whether adverse or positive. This is determined by the Environment and Social Safeguards Coordinator in consultation with the Project Team and is based on a subjective assessment of project activities, circumstances of indigenous peoples, social risks, and project impacts.

Projects are required to screen for the presence of indigenous peoples early during project preparation. Indigenous peoples are identified as—among other criteria— a distinct, vulnerable, social, and cultural group possessing (i) self-identification and/or identification by others as indigenous peoples and (ii) collective attachment to land, presence of customary institutions, indigenous language, and primarily subsistence-oriented production.

The screening process can be based on literature review and secondary sources, but would usually also include consulting experts on the local context. Screening may also involve consultations with affected communities, indigenous peoples' organizations, NGOs, and government representatives, as appropriate.

Once it has been determined that indigenous peoples are present in the project area, the Project Team utilizes a Social Impact Assessment (SIA) (**please see Annex 2**) to assess the particular circumstances of the affected communities and the project's positive and adverse impacts on them. The SIA will be used to identify means to avoid or mitigate adverse impacts, ensure that project activities are culturally appropriate, enhance benefits to target groups, and determine whether the project is likely to succeed in the given socioeconomic and cultural context. In this way, the SIA informs the preparation of the project and, if warranted, the preparation of an Indigenous Peoples Plan. The SIA would confirm what, if any, impacts the project might have on indigenous groups and identify any particular issues to consider in project design and during project implementation concerning indigenous peoples. This SIA is discussed with the indigenous communities during the consultation process (see below).

7.5 Consultations

WWF adheres to a policy of FPIC based on International Labor Organization (ILO) Convention No. 169 Concerning Indigenous and Tribal Peoples in Independent Countries and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).

The terms in FPIC are as defined by the United Nations Economic and Social Council (2005): Free: without coercion, intimidation, or manipulation; Prior: before the start of any activity while also respecting indigenous consultation/consensus processes; Informed: indigenous peoples have full information about the scope and impacts of the proposed activity on their lands, resources, and well-being; Consent: right to say yes or no as a result of consultation and participation in good faith.

The Project Team undertakes a process of consultations with the indigenous peoples during project preparation to (i) inform them about the project, (ii) fully identify their views, (iii) inform/adapt the project design, and (iv) obtain their free, prior, and informed consent to project activities affecting them and, if its development is required, the Indigenous Peoples Plan (IPP).

The extent of consultations depends on the project activities, their impacts on indigenous peoples, and the circumstances of the communities. As a minimum (e.g., for projects with no impacts on, or no direct interventions with, the indigenous communities), indigenous peoples are informed about the project prior to its implementation, asked for their views on the project, and assured that they will not be affected during project implementation.

For projects affecting indigenous communities, whether positively or adversely, a more elaborate consultation process is required. This may include, as appropriate:
• Informing affected indigenous communities about proposed project objectives and activities prior to project approval so that their concerns can be addressed in project development;
• Discussing and assessing possible adverse impacts and ways to avoid or mitigate them;
• Discussing and assessing potential project benefits and how these can be enhanced;
• Discussing and assessing land and natural resource use and how management of natural resources may be enhanced;
• Identifying customary rights to land and natural resource use and identifying possible ways of enhancing these or at least safeguarding them;
• Identifying and discussing (potential) conflicts with other communities and how these might be avoided;
• Discussing and assessing community well-being and food security and how this might be affected or enhanced through project interventions;
• Eliciting and incorporating indigenous knowledge into project design, as appropriate;
• Ascertaining the affected communities' consent to project activities affecting them; and
• Developing a strategy and process in conjunction with the community for indigenous peoples' participation and consultation during project

implementation, including for participatory monitoring and evaluation, and through which consent can be obtained at multiple stages throughout the life of the project.

Any and all consultations should be conducted in accordance with the following guidelines:
- The consultations should be conducted in a manner that is culturally appropriate, taking into consideration the indigenous communities' decision-making processes. All project information provided to indigenous peoples should be in a form appropriate to their needs, and taking into account literacy levels. Local languages should usually be used and efforts should be made to include all community members, including women and members of different generations and social groups (e.g., clans and those of different socioeconomic backgrounds). The consultations should occur without any external manipulation, interference, or coercion. Communities should have prior access to information about the intent and scope of the project, including possible positive and negative results, and should be allowed to have discussions among themselves before agreeing to project activities.
- When seeking affected indigenous peoples' consent for the project, it should be ensured that all relevant social groups within the community have been adequately consulted (e.g., women, elders, etc.). The decision-making process of the affected indigenous peoples should determine the appropriate approach for ascertaining that they have provided their agreement to the proposed project activities.

The Project Team is responsible for the oversight of the implementation of a consultation process. If the indigenous communities are organized in community associations or umbrella organizations, these may also be consulted. In some cases, it may be necessary to include in the process independent entities that have the affected communities' trust. The experience of (other) locally active NGOs and an Indigenous Peoples Expert may also be useful when necessary.

The consultations will be documented, and agreements or special design features providing the basis for the affected indigenous peoples' consent to the proposed project should be described in the full proposal and, if required, the Indigenous Peoples Plan; any disagreements raised will also be documented, including how they were resolved or addressed.

7.6 Guidance on Preparing an Indigenous Peoples Plan
Based on the social assessment and consultations, the project is designed to address issues pertaining to indigenous peoples. If a project may potentially have adverse impacts on, or have direct interventions with, indigenous communities, an Indigenous Peoples Plan is prepared. Whether a project requires an IPP is determined by the Environment and Social Safeguards Coordinator in consultation with the Project Team.

If a project also involves involuntary restrictions on access to natural resources, a Resettlement Action Plan or Process Framework and an Indigenous Peoples Plan should be prepared in tandem and with the participation of affected indigenous communities. In cases where indigenous peoples are the sole or the overwhelming majority of direct project beneficiaries and the project focus is

delivery of these benefits, a stand-alone IPP is not required; instead the elements of an IPP can be included in the overall project design document.

The contents of the IPP depend on the project activities and impacts on indigenous peoples. As a minimum, the IPP should include:
- A description of the indigenous peoples affected by the proposed project;
- A summary of the proposed project;
- A detailed description of the participation and consultation process during implementation;
- A description of how the project will ensure culturally appropriate benefits and avoid or mitigate adverse impacts;
- A budget;
- A mechanism for complaints and conflict resolution; and
- A monitoring and evaluation system that includes monitoring of particular issues and measures concerning indigenous communities.

The following elements and principles may be included in the IPP, as appropriate:
- Specific measures for implementation, along with clear timetables of action, budget, and financing sources. The IPP measures should also be incorporated into the general project design as appropriate. Emphasis should be on enhancing participation and culturally appropriate benefits. Adverse impacts should be contemplated only when absolutely necessary and when agreed to by the affected communities;
- A description and documentation of the free, prior, and informed consent reached during the project preparation consultation process;
- Clear output and outcome indicators developed with the affected indigenous peoples;
- A project design drawing upon the strengths of indigenous peoples' communities and their local institutions, taking into account their languages, cultural and livelihood practices, social organization, and religious beliefs;
- Use of indigenous and traditional knowledge and local resource management arrangements in project design as appropriate and with the community's consent;
- Special measures for the recognition and support of customary rights to land and natural resources. This is particularly the case for projects that support the development of management plans and other forms of land and natural resource use planning. Projects that support policy development may also affect indigenous peoples' customary rights;
- Special measures concerning women and marginalized subgroups in the communities to ensure inclusive development activities;
- Capacity-building activities for the indigenous communities to enhance their participation in project activities;
- Capacity building of the Project Team (and any other implementing agency) concerning indigenous peoples' issues;
- If the Project Team does not possess the necessary technical capacities concerning working with indigenous peoples, the involvement of experienced local community organizations and NGOs acceptable to the affected indigenous peoples;
- A grievance mechanism taking into account local dispute resolution practices; and

- Monitoring and reporting arrangements, including mechanisms and benchmarks appropriate to the project and affected communities. Participatory monitoring and evaluation exercises adapted to the local context, indicators, and capacity should be included.

7.7 Standard Outline for an Indigenous Peoples Plan

The Indigenous Peoples Plan (IPP), while adhering to the policies and practices described herein, is prepared in a flexible and pragmatic manner, and its level of detail varies depending on the specific project and the nature of effects to be addressed.

The IPP includes the following elements, as needed:
- A summary of the legal and institutional framework applicable to indigenous peoples in the area and a brief description of the demographic, social, cultural, and political characteristics of affected indigenous peoples' communities, the land and territories that they have traditionally owned;
- A summary of the social assessment;
- A summary of results of the participatory consultation with the affected indigenous peoples' communities that was carried out during project preparation and that led to their free, prior, and informed consent to the project;
- A framework for ensuring free, prior, and informed consent with the affected indigenous peoples' communities during project implementation;
- An action plan of measures to ensure that the indigenous peoples receive social and economic benefits that are culturally appropriate, including, if necessary, measures to enhance the capacity of the project executing entities to ensure that they are delivered and/or sustained;
- When potential adverse project effects on indigenous peoples are identified, an appropriate action plan of measures to avoid, minimize, mitigate, or compensate for these adverse effects;
- The cost estimates and financing plan for the IPP coordinated to ensure consistency with the overall project budget;
- Accessible procedures appropriate to the project to address grievances by the affected indigenous peoples' communities arising from project implementation. When designing the grievance procedures, the Project Team takes into account the availability of judicial recourse and customary dispute settlement mechanisms among the indigenous peoples; and
- Mechanisms and benchmarks appropriate to the project for monitoring, evaluating, and reporting on the implementation of the IPP. These monitoring and evaluation mechanisms should include arrangements for consultation with and the free, prior, and informed consent of the affected indigenous peoples' communities with respect to monitoring and evaluation.

7.8 Standard Outline for an Indigenous Peoples Planning Framework

The project involves the preparation and implementation of annual investment programs or multiple subprojects. Since initial screening indicates that vulnerable indigenous peoples (IP) are likely to be present in, or have collective attachment to, the project area, but the potential for adverse impacts cannot be determined until the programs or subprojects are identified, the Indigenous Peoples Planning Framework (IPPF) provides for the screening and review of these programs or subprojects.

The IPPF should embody the following elements:
- An introduction to the types of components, subcomponents, and subprojects likely to be proposed for financing under the project;
- A short introduction to the vulnerable/marginalized indigenous peoples who might be affected by the project (ethnicity, demographics, socioeconomic situation, etc.);
- The potential positive and adverse effects of the project on the IP;
- A plan to carry out social assessments for such programs/subprojects;
- A framework to ensure FPIC and consent processes with the affected IP's communities at each stage of the preparation and implementation of the project;
- Institutional arrangements (including capacity building where necessary) for screening project-supported activities, evaluating their effects on IP, preparing IPPs, and addressing any grievances;
- Monitoring and reporting arrangements, including mechanisms and benchmarks appropriate to the project; and
- Disclosure arrangements for IPPs to be prepared under the IPPF.

7.9 Institutional Arrangements, Monitoring, and Disclosure

The Project Team is responsible for incorporating recommendations from the IPP/IPPF into project design and executing the project in conformity with WWF's Policy on Indigenous Peoples. This includes defining monitoring indicators and reporting on progress of their achievement.

The WWF Environment and Social Safeguards Coordinator will monitor implementation of the IPP. The Environment and Social Safeguards Coordinator will approve the ToR for the IPP and the IPP report. In addition, the Environment and Social Safeguards Coordinator will review and approve the elements of project-specific IPPs and other measures concerning indigenous peoples and will monitor the implementation of these plans. During project preparation and implementation, the Environment and Social Safeguards Coordinator may request further information concerning the project's effects on indigenous peoples, and request further assessment or consultations as well as work on the IPP.

IPPs prepared for projects under this framework should be disclosed in a culturally appropriate manner in draft form to affected communities prior to approval by the Environment and Social Safeguards Coordinator and again after project approval and prior to implementation. Language is critical and the IPP should be disseminated in the local language or in other forms easily understandable to affected communities; oral communication methods are often needed to communicate the proposed plans to affected communities.

Procedures for Policy on Accountability and Grievance Mechanism

8.1 Introduction

WWF's Policy on Accountability and Grievance Mechanism has established a grievance mechanism to allow for the expression of and response to complaints related to the implementation of its projects. This mechanism is designed to allow project-affected people to ask critical questions about WWF projects.

The grievance redress mechanism is designed to enable the receipt of complaints of affected women and men and public concerns regarding the environmental and social performance of the project. In short, the aim of the mechanism is to provide people fearing, or suffering adverse impacts, with the opportunity to be heard and assisted. It is designed to address the concerns of the community(ies) with a particular project, identify the root causes of the conflicts, and find options for the resolution of grievances. Therefore, it is an essential tool to foster good cooperation with project stakeholders and ensure adequate delivery of previously agreed-upon results.

8.2 Eligibility

Any community or group (at least two or more people) that believes it is or may be negatively affected by a failure on the part of WWF to follow its safeguards, gender mainstreaming, and community rights and resources policies in the design or implementation of a WWF project activity is considered an "Affected Party." Any Affected Party may file a complaint. Representatives filing a complaint on behalf of an Affected Party must provide concrete evidence of authority to represent them. While anonymous complaints will not be considered, complainants can request confidentiality. Since this complaints process is oriented toward direct dialogue and engagement among all parties, there is a risk that confidentiality may limit efforts to resolve complaints, and complainants will be informed if confidentiality is impeding the process.

8.3 Complaint Filing Process

WWF has designated its Senior Director for Public Sector Support as its "Project Complaints Officer" (PCO). As PCO, this individual is responsible for ensuring that the institution executes the procedures required under this policy.

Confidential complaints should be directed to the WWF Project Complaints Officer, Senior Director for Public Sector Support and Government Affairs in Washington, DC. Complaints may be submitted by email to SafeguardsComplaint@wwfus.org or delivered by post to Safeguards Complaints, 1250 24th Street NW, Washington, DC 20037.

Complaints may be submitted in the Affected Party's native language and should include the following information:
- Complainant's name and contact information;
- If not filed directly by the complainant, proof that those representing the affected people have authority to do so;
- The specific project or program of concern;

- The harm that is or may be resulting from the project;
- The relevant Environmental and Social Safeguards policy or provision (if known);
- Any other relevant information or documents;
- Any actions taken so far to resolve the problem, including contacting WWF;
- Proposed solutions; and
- Whether confidentiality is requested (stating reasons).

8.4 Complaint Review Process

The WWF Project Complaints Officer will acknowledge receipt and—within 10 business days—assess the eligibility of the complaint and provide a response as to whether or not it is eligible, in accordance with the above criteria. The source of the complaint is treated with confidentiality, unless this is waived.

If the complaint is eligible, the PCO will notify the Project Team and request that it provide a response. The Project Team will provide a response within 10 business days with information on how it plans to look into the complaint and a time frame for this process. The PCO will communicate this information to the Affected Party. The Project Team will then look into the matter, with technical support as needed, for example, through investigation of the issues raised and dialogue with the Affected Party (unless confidentiality is requested) and other concerned parties. Based on the results, the Project Team will work with concerned parties to develop an action plan and time frame of steps required to resolve any issues identified. A summary of the concerns raised, actions taken, conclusions reached, follow-up plan, and time frame for completion will be documented and communicated as agreed to by the parties and provided to the PCO. (If confidentiality has been requested, the PCO will then communicate the response to the Affected Party.)

At the country level, the Project Team is required to provide information on this policy to Affected Parties. Typically this is provided during consultations in the design phase of the project. This requirement is established in this policy.

8.5 Non-retaliation

WWF expressly prohibits any form of retaliation against any employee for raising or reporting a bona fide complaint under this policy or for assisting in a complaint investigation. Any employee who is found to have participated or engaged in retaliatory conduct will be subject to disciplinary action, up to and including termination. Staff members who reasonably believe that they have been victims of any such retaliation should inform Human Resources, the General Counsel's Office, or the PCO immediately.

8.6 Monitoring

Agreed-upon action plans should establish time frames for regular process monitoring toward resolution of the complaint. The PCO will coordinate the monitoring by organizing periodic checks—bringing together the concerned parties and relevant technical advisors for calls, meetings, or other communication on the status of action plans, until they are completed. WWF will also assess the effectiveness of this complaints resolution process on an annual basis, and identify any needs for improvement.

Procedures for Implementation of Standard on Pest Management

9.1 Introduction

A Pest Management Plan (PMP) is prepared by the Project Team when required by the WWF Environment and Social Safeguards Coordinator to ensure the use of best practices in the control and removal of alien and invasive plants, insects, and animals.

The objective of the guidance below is to minimize and manage environmental and health risks associated with the application of pesticides, insecticides, and herbicides (herewith referred to in the unitary as "pesticides") in efforts to restore natural habitats. It describes the requirements and planning procedures for Project Teams in the preparation and implementation of projects to control alien and invasive species.

Any project that proposes to use chemical pesticides must include a PMP with the following sections:

- An assessment of the institutional and legal framework under which the pesticide will be applied, with reference to the documentation and standards required under local and national law and international good practice. Where the particular pesticide is not regulated at the target site, the proponent must identify similar pesticides and the applicable regulation, international laws in neighboring countries that could apply, and international good practice. The proponent must also explain why this particular pesticide is necessary even in the absence of applicable laws;
- A risk assessment of the danger to non-target species must be carried out and it must show clearly that the risk is negligible compared with the benefits to the remaining wildlife when the target species (e.g., rat) is eradicated. For example, in most cases, any short-term losses of individuals of native species are offset by the longer-term benefits of removing the rats, but the project's PMP must show this. However, this section must provide evidence that this is the case for this particular application. Moreover, aerial operations require an assessment of environmental effects to weigh the benefits and risks to humans, all affected species, and the environment in the long term;
- A detailed description of acquisition and application parameters. Any pesticide must be identified by both its chemical name and its trade name. Information must be included about where the pesticide will be purchased and that the seller has a license to sell this product, how it will be stored and transported to the target site in a safe and appropriate way, and how it will be used. In particular, this section must include details on the personal protective equipment and capacity of the applicator(s) to apply the pesticide (e.g., Have they been trained? Have they done this before?);
- A section that outlines how the proponent will disclose its intentions and consult with local authorities and project-affected communities that may have a regulatory function or be at risk during pesticide application; and
- A final section that outlines what steps the proponent will take to monitor and evaluate the purchase, storage, application, and effects of the pesticide in the target area.

A single set of guidelines cannot anticipate every scenario under which an Executing Entity will propose to remove alien and invasive species. The conditions of the habitat, the type of species present or being eradicated in the target area, the method of control, the capacity of the organization, the latest knowledge of environmental impacts, and even the definitions of "best practice" will change over time. WWF projects will not, however, finance the use of any pesticides categorized IA, IB, or II by the World Health Organization (e.g., brodifacoum, paraquat).

Projects should benefit from the accumulated knowledge on the use of pesticides in invasive eradication, including those that are available at:
- The IUCN Invasive Species Specialist Group,[32] which provides dozens of resources, including The Global Invasive Species Database (GISD);
- The Global Invasive Species Information Network (GISIN) hosted by Colorado State University and USGS;[33] and
- The World Health Organization's Recommended Classification of Pesticides by Hazard, updated every two years.[34]

Disclosure: The Pest Management Plan and/or the documents required in countries where adequate policies exist are public documents. The Project Team must make final plans available to affected parties and to the public. WWF will place final approved plans on the WWF Safeguards Resource web page.

9.2 Indicative Template for an Integrated Pest Management Plan
The chief tool for projects falling under WWF's Minimum Standards for Pest Management is the preparation of a comprehensive Integrated Pest Management Plan, which will outline the various elements of the plan and the actions needed to be taken to adequately address these concerns during project implementation.

9.2.1 Pest or Vector Management Approaches
- Current and anticipated pest or disease vector problems, relevant to the project.
  - Prepare an overview of the major crops cultivated and the key pest and diseases problems experienced, especially by smallholder farmers. Provide estimates (preferably based on local studies) of the crop/economic losses that can be attributed to the key pests, diseases, and weeds. In the case of a public health project, carry out a similar analysis for disease vectors.
  - Assess the potential changes in pest or vector-borne disease problems that can be anticipated as a result of the project's activities.
- Current and proposed pest management practices.
  - Describe the current methods for pest or vector management practiced in the country. Describe the non-chemical pest control methods, IPM, or IVM approaches that are available in the country.
  - Assess the activities of the national plant protection, public health, and extension services aimed at providing pest management advice to farmers. Evaluate to which extent the system includes integrated pest or vector management. Assess the extent to which pest management information is transmitted to farmers.
  - Assess the agronomic, economic, and environmental sustainability of the present and proposed pest or vector management practices.

- Inventory the pest or vector control methods or approaches that have been field-tested or introduced in the past in the country but which have not established themselves as current practices. Evaluate the reasons for this lack of success.
- Describe any new pest or vector control methods or approaches that are being tested or introduced into the country.
- Assess the potential changes in pest or vector management that can be anticipated as a result of the project activities.
- Relevant IPM/IVM experience within the project area, country, or region.
  - Describe any IPM or IVM methods locally available for the management of the major pests and diseases of crops that are the target of the project and, if appropriate, for other crops grown by local farmers.
  - Assess the strengths and weaknesses of implementation of IPM or IVM activities in the country to guide the choice of activities that could be carried out during project implementation.
  - Identify relevant existing IPM or IVM projects or programs that are operational in the country and that should be approached/included for collaboration.
  - Review the development and conduct of IPM research programs within the national agricultural research institute, or in any regional or international agricultural research centers, relevant to the project activities.
- Assessment of proposed or current pest management approaches, and recommendations for adjustment where necessary.
  - Where the current practices, or those proposed under the project, are not consistent with the principles of IPM or IVM, the discrepancies should be discussed. Either a detailed technical justification should be provided for this discrepancy, or a strategy should be proposed to bring pest or vector management activities under the project into line with IPM or IVM.

9.2.2 Pesticide Use and Management
- Review of present, proposed, and/or envisaged pesticide use.
  - Compile a list of pesticides in use in the country and the crops or vectors for which they are used. Classify the (commercial formulations of the) pesticides according to the WHO classification of pesticides by hazard.
  - Describe the current pesticide use patterns in the country and assess whether pesticides are used in the context of IPM.
  - Assess if envisaged pesticide use under the project is justified by (1) explaining the IPM approach and the reason why pesticide use is considered; and (2) providing an economic assessment demonstrating that the proposed pesticide use would increase farmers' revenues, or, for public health projects, provide evidence that the proposed pesticide use is justified from the best available (preferably WHO-supported) public health evidence.
- Indication of type and quantity of pesticides envisaged to be used by the project and/or assessment of increase in pesticide use resulting from the project.

- Estimate the quantity (in volume and value) of pesticides envisaged to be financed (either directly or indirectly, e.g., through credit provision) by the project.
- If pesticides are not directly used in the project, identify project activities that may lead to increased pesticide use, and estimate this increase.
- For both the above-mentioned situations, evaluate whether higher pesticide use would also result in increased farmer dependence on pesticides.
- Circumstances of pesticide use and the capability and competence of end-users to handle products within acceptable risk margins.
  - Assess user access to, and use of, protective gear and appropriate application equipment; levels of knowledge and skills of users to handle pesticides correctly; users' product knowledge and understanding of hazards and risks; and appropriateness of on-farm storage facilities for pesticides.
- Assessment of risks.
  - Evaluate the actual potential environmental, occupational, and public health risks associated with the transport, storage, distribution, and use of the proposed products under local circumstances, and the disposal of empty containers.
  - Assess to what extent the project's activities will increase or reduce such risks.
- Prerequisites and/or measures required to reduce specific risks associated with envisaged pesticide use under the project.
  - Identify the strengths and weaknesses in the country for proper handling of pesticides and propose the measures needed in the project to guarantee judicious use of pesticides. For example, outline details of training activities to build capacities in pesticide management, risk reduction, use of appropriate application equipment and protective gear, and recognition of circumstances leading to pesticide poisoning.
  - Selection of pesticides authorized for procurement under the project. If required, prepare provisional lists of pesticides that may be procured under the project, taking into consideration (1) the above hazards and risks; and (2) the availability of newer and less hazardous products and techniques (e.g., bio-pesticides, traps).

9.2.3 Policy, Regulatory Framework, and Institutional Capacity
- Policies on plant protection.
  - Assess the government policies on pest management (crop protection and vector control) and their consistency with IPM approaches. Evaluate whether there are direct or indirect subsidies for pesticides, donated pesticides that distort market prices, or other factors that may increase reliance on (unnecessary) pesticide use.
  - Study whether a national IPM/IVM policy exists and determine whether it is integrated into the national agricultural development policy/strategy.
- Description and assessment of the national capacity to develop and implement ecologically based IPM.

- Assess the quality of public- and private-sector extension services, extension services provided by NGOs and research institutions, and their practical capacity to develop and implement (participatory) IPM or IVM.
- Assessment of the country's regulatory framework for control of the distribution and use of pesticides.
  - Inventory the presence and quality of plant protection legislation and pesticide legislation. Assess whether a pesticide registration scheme has been set up and is operational. Assess whether a pesticide distributor and/or user-licensing scheme exists.
  - If relevant, evaluate whether local pesticide production and/or formulation is appropriately regulated.
- Assessment of the institutional capacity for effective control of the distribution and use of pesticides.
- Evaluate whether the country has the institutional and financial capacity to enforce the above-mentioned legislation. In doing so, assess whether:
  - Sufficient trained personnel is available for inspection and control tasks;
  - The government actively monitors pesticide use and storage;
  - Pesticide products are properly packaged and labeled;
  - Effective measures can be taken to limit access to Class II pesticides to licensed users if the use of such products is proposed;
  - The government monitors the quality of imported/locally produced pesticides (Is there a quality control laboratory?);
  - Pesticide residues are being monitored on export crops and crops for the domestic market;
  - Poisoning statistics are available, especially in rural areas;
  - Medical staff at rural clinics are trained to recognize and treat pesticide poisoning; and
  - Antidotes are available in rural areas.
- Assess the system for managing unwanted and obsolete pesticides; to what extent might the project activities contribute to the accumulation of obsolete pesticides?

9.2.4. Strengthening of Capacities
- On the basis of the outcome of the above reviews, and if necessary, propose an action plan containing appropriate measures, in project subcomponents, to strengthen the national capacities to improve the regulatory system for pesticides, and implement ecologically sound management of pests and vectors.
- Identify which components should be covered by the project and which need to be funded and/or executed under other government or donor activities.
- Estimate the financial requirements and suggest funding mechanisms for the implementation of the plan.

9.2.5 Monitoring and Evaluation

- Description of activities that require local monitoring during implementation and during supervision missions.
  - ○ Describe these activities and propose realistic performance indicators that can be used to evaluate progress toward the implementation of sustainable pest management, effectiveness of measures to mitigate pesticide risks, progress in strengthening regulatory framework and institutional capacity, etc.
- Monitoring and supervision plan, implementation responsibilities, required expertise, and cost coverage.
  - ○ Prepare a monitoring and supervision plan that would be adopted during project supervisory missions. For example, in the plan include the types of expertise required at different stages of project implementation, actual monitoring activities, and a detailed budget.

Procedures for Implementation of Standard on Stakeholder Engagement

10.1 Introduction

Stakeholder engagement is an inclusive process conducted throughout the project life-cycle. It is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions, and the assessment, management and monitoring of projects environmental and social risks and impacts.

Stakeholder engagement is the continuing process by which the Project Team identifies and communicates with the people affected by project decisions and activities, and others with an interest in implementation and outcomes of its decisions. It should take into account the different access and communications needs of various groups and individuals, especially those who are vulnerable or disadvantaged.

Engagement begins as early as possible in project preparation because early identification of and consultation with affected and interested parties allows stakeholders views, feedback and concerns to be considered in the design of the project.

Documentation of stakeholder engagement includes the following, as appropriate:
- Date and location of each meeting, with copy of the notification to stakeholders;
- The purpose of the engagements (e.g. to inform stakeholders of an intended project to gather their views on potential environmental and social impacts of an intended project);
- The form of engagement and consultation (e.g. face to face meetings, townhalls, workshops, focus groups, written consultations, etc);
- Number of participants and categories of participants;
- Summary of main points and concerns raised by stakeholders;
- Summary of how stakeholder concerns were responded to and considered, and;
- Issues and activities that require follow up actions, including clarifying how stakeholders are informed of decisions.

10.2 Definitions

Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who may have an interest in a project and/or the ability to influence its outcomes, either positively or negatively. Stakeholders may include local affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, and businesses.[35]

Stakeholder analysis is the process of identifying a project's key stakeholders and assessing their interest in the project and the ways in which these stakeholders may influence the project's outcomes. Stakeholder analysis provides the foundation for planning stakeholder engagement throughout the project cycle.

Project Affected People includes those likely to be affected by the project because of the actual impacts or potential risks to their physical environment, health, security, well being or livelihoods. These stakeholders may include individuals or groups, including local communities.

10.3 Objectives

- To establish a systematic approach to stakeholder engagement that will help Project Teams identify stakeholders, in particular project affected people,[36] and build and maintain a constructive relationship with them;
- To identify stakeholder priorities and assess the level of stakeholder interest and support for the project;
- To enable stakeholders' views and feedback to be considered in project design and to achieve sound environmental and social performance in the project;
- To learn from and incorporate local knowledge to improve project design and sustainability;
- To promote and provide means for effective and inclusive engagement with project affected parties throughout the project life cycle on issues that could potentially affect them;
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner;
- Identify potential constraints and conflicts and provide project affected peoples with accessible and inclusive means to raise issues and grievances; and
- To provide stakeholders, especially project affected people, with a monitoring mechanism.

10.4 Engagement During Project Preparation

Stakeholders should be engaged throughout the project life cycle. To ensure that a project is designed to be effective in compliance with safeguards, it is important to start engaging stakeholder early in the preparation process.

10.4.1 Stakeholder Analysis

During project preparation, a stakeholder analysis[37] should be developed by the Project Team as a basis for a full stakeholder engagement plan.

10.4.1.1 Identification of Stakeholders

The first step of a stakeholder analysis is to identify relevant stakeholder groups.

Projects will typically involve a broad range of stakeholders. The stakeholder analysis needs to be initiated early to identify key stakeholder groups and individuals to be involved in the project planning process.

Since the full scope of project activities and potential stakeholders are not yet defined at this stage, an initial list of stakeholders should be generated. Special attention should be given to identifying disadvantaged and vulnerable groups. This could be based on a desk review and expert input from the country focal point as well as government representatives. It is recommended that at this stage the stakeholder identification exercise is an expansive one so that relevant groups are not inadvertently excluded.

The initial list of identified stakeholders should be verified, modified and enhanced through interviews with key informants (eg. government

representatives, local CSO representatives, experts etc.), consultations with already identified stakeholders, and site visits. The list should be disseminated to stakeholders with an explanation on how other groups may be suggested or put themselves forward. It is important to not just rely on known entities and to reach out to groups who typically may be excluded from decision making processes, in particular women and marginalized groups that can be affected by the project.

Additional due diligence may be required in identifying potential indigenous people stakeholders. Although IP groups may be clearly recognized by national governments, this is not always the case (**refer to WWF's Policy on Indigenous People for the definition of Indigenous People**).

The identification process must then be updated and refined as the design of the project takes shape and the full scope of the project's activities—and range of potential stakeholders—are better understood. This should occur during the safeguards process whereby the project's environment, social and geographic scope will be identified and provide a more comprehensive view of who may be affected—either directly, indirectly or by cumulative impacts.

10.4.1.2 Identifying Stakeholder Interest in the Project
Once the relevant stakeholder groups have been identified, the next step is to discern their interests in the project and how their interest may be affected. Identification of stakeholder interest can help illuminate the motivations of different actors and how they may influence the project, including potential project opponents.

10.4.1.3 Stakeholder Prioritization
It is not practical and usually not necessary to engage all stakeholder groups with the same level of intensity all the time. Being strategic and clear as to whom the project will be engaging with and why can save resources and time. The group of potential stakeholders and their interest will naturally be quite diverse. Prioritization will help identify appropriate forms of engagement for different stakeholder groups.

10.4.1.4 Refer to Past Stakeholder Information and Consultation
Referring to historical stakeholder information related to the project can save time and add up risks, liabilities or unresolved issues that can then be prioritized and managed in relation to the different strategic alternatives being considered.

10.4.1.5 Engage with Stakeholders in their own Communities
In general, Project Teams should choose a venue where stakeholders feel more comfortable—most likely at a location within the community that tends to have a more productive engagement processes.

10.5 Stakeholder Engagement Plan (SEP)
Development of the SEP should be based on the project's stakeholder analysis. No one type or format of a stakeholder engagement plan will accommodate all projects. The process of developing the SEP must be inclusive and the draft SEP is designed to accommodate the needs and circumstances of different stakeholders. It identifies the information and types of interaction to be conducted in each phase of the project, and includes any other stakeholder engagement required by safeguards in the SIPP.

SEP content (See below SEP template) will depend on various factors including the nature, scale, location and duration of project, diverse interest of stakeholders, the scale of the project's potential positive and adverse impacts on people and the environment, and the likelihood of grievances.

It is important to be transparent about uncertainties and knowledge gaps during early stakeholder engagement. Working with a broad range of stakeholders will likely help to define project parameters and fill key knowledge gaps and, if necessary, generate alternative ideas regarding project design and potential risks and mitigation measures, monitoring and grievance mechanisms.[38]

The draft SEP must be made available to stakeholders in formats and through channels that are appropriate to them. As relevant to the project, the draft SEP invites input on aspects such as:
- Whether the list of identified stakeholders is accurate;
- The proposed methods of notification and engagement (for example, where meetings and workshops may be held and how to communicate with disadvantaged and vulnerable groups);
- The proposed extent and format of engagement (for example, meetings and during of the consultation period);
- The format and the language of information to be provided.

Stakeholder views and feedback on these aspects are then reviewed and incorporated in the SEP as appropriate. If significant changes are made to the SEP a revised SEP is publicly disclosed.

As project information changes due to recommendations from assessments and mitigation plans, or as project activities are identified, the stakeholder engagement plan should be reviewed and modified accordingly to ensure its effectiveness in securing meaningful and effective stakeholder participation.

The SEP should anticipate if/when professional, neutral facilitators might be needed to lead key engagement activities. For projects where the stakeholder engagement process is likely to be complex or sensitive, social advisors or other expert staff should help design and facilitate the process and assist with participatory methodologies and other specialized techniques.[39]

The grievance redress mechanism for the project needs to be described in the stakeholder engagement plan.

The SEP should outline a reasonable budget for stakeholder engagement activities, including potential support for groups to facilitate their participation when necessary.

Prior to project concept finalization, a validation workshop should be held with stakeholders that in addition to confirming the project design also includes a review and agreement on the SEP. With the start of project implementation an inception workshop should be held to assist project partners to understand the approved project design and understand their roles and responsibilities in the project. Project Teams should also have an understanding of stakeholder engagement plans during project implementation monitoring including communications, reporting, and conflict resolution and grievance redress.

The SEP Framework is used when the design and location of the project cannot be known during project preparation, or when a project has multiple sub projects that will only be designed during project implementation. In these cases, the framework sets out the principles to be followed for stakeholder engagement and indicates how people are notified as key information becomes known. The SEP is updated as and when the specific details become known, for example the specific locations, stakeholders and schedule of activities.

10.5.1 Template for a SEP

A comprehensive SEP should contain the following sections:

Introduction. A brief description of the project including design elements and potential social and environmental issues. Where relevant, include maps of the project site and surrounding area.

Regulations and Requirements. A summary of any legal, regulatory donor/lender requirements pertaining to stakeholder engagement application to the project. This may include public consultation and disclosure requirements related to the social and environmental assessment process as well as relevant international obligations.

Previous Stakeholder Engagement Activities. A summary of the Executing Agency and the project team activities to date, including information disclosure and/or consultation, provide the following details:
- Type of information disclosed, in what forms and languages (e.g. oral brochure, reports, posters, radio etc.) and how it was disseminated;
- Location and dates of any meetings undertaken to date;
- Individuals, groups and/or organizations that have been consulted;
- Key issues discussed, and key concerns raised;
- Reponses to issues raised, including any commitments or follow up actions;
- Process undertaken for documenting these activities and reporting back to stakeholders.

Project Stakeholders. A summary of the key stakeholder groups who will be informed about and engaged in the project (based on stakeholder analysis). These should include persons or groups who:
- Are directly and or indirectly affected by the project or have "interests" ion the project that determine them as stakeholders, and;
- Have the potential to influence project outcomes and operations (examples of potential stakeholders are beneficiaries and project affected communities, location organizations, NGOs and government authority's indigenous peoples, stakeholders can also include politicians, private sector companies, labor unions, academics, religious groups, national environmental and social public-sector agencies, and the media).

Stakeholder Engagement Plan
- Summarize the purpose and goals of the plan. Briefly describe what information will be disclosed, in what formats and languages, and the types of methods that will be used to communicate this information to each of the stakeholder groups identified in section 4 of this template. Methods used may vary according to target audience, for example:

- o Newspapers, posters, radio, television;
- o Information centers and exhibitions, or other visual display;
- o Brochures, leaflets, posters, non-technical summary documents and reports.
- Briefly describe the methods that will be used to engage and/or consult with each of the stakeholder groups identified in section 4. Methods may vary according to the target audience. For example:
  - o Interviews with stakeholder representatives and key informants;
  - o Surveys, polls and questionnaires;
  - o Public meetings and/or focus groups with specific groups;
  - o Participatory methods;
  - o Other traditional mechanisms for consultation and decision making.
- Describe how the views of women and other relevant groups (minorities, elderly, young other marginalized groups) will be considered and their participation ensured and facilitated. Some vulnerable groups may require additional preparatory activities to participate in such meetings.
- Where relevant, define activities that require prior consultations and FPIC from Indigenous People (refer to WWF's Policy on Indigenous Peoples).
- Outline methods to receive feedback and to ensure ongoing communications with stakeholders (outside of a formal consultation meeting).
- Describe any other engagement activities that will be undertaken, including participatory processes, joint decision making, and/or partnerships undertaken with local communities, NGOs, or other project stakeholders (e.g. benefit sharing programs, stakeholder led initiatives, training and capacity building/support programs).

Timetable
- Provide a schedule outlining dates/periodicity and locations where various stakeholder engagement activities including consultation, disclosure, and partnerships will take place and the date by which such activities will be undertaken.

Resources and Responsibilities
- Indicate who will be responsible for carrying out the specified stakeholder engagement activities.
- Specify the budget and other resources allocated toward these activities.
- For projects with significant potential impacts and multiple stakeholder groups it is advisable to hire a qualified stakeholder engagement facilitator to undertake all or portions of the stakeholder engagement activities.

Grievances Mechanism
- Describe the process by which people concerned with, or potentially affected by, the project can express their grievances for consideration and redress. Detail how grievances will be received, by whom, how the grievances will be resolved and how the response will be communicated.
- Ensure reference is made to and stakeholders are informed of the availability of WWF's Accountability Mechanism (Refer to WWF's Policy on Accountability and Grievance Redress Mechanism) as additional avenues of grievance redress.

Monitoring and Reporting
- Describe any plans to involve project stakeholders (including target beneficiaries and project affected groups) or a third-party to monitor project implementation, potential impacts and management/mitigation measures.

10.6 Information Disclosure

Meaningful stakeholder engagement depends mainly on timely, accurate and comprehensible information. Making available project related information as early as possible in the project cycle and in a manner and language appropriate for each stakeholder group is important. It is good practice to make special efforts to inform disadvantaged and vulnerable groups about the impacts of the project and means of obtaining access to compensation and benefits, and how and when to raise grievances.

It is important to remain responsive to requests for information from Project Affected Peoples throughout the project cycle and set appropriate systems to make project information available.

10.7 Consultation

The SEP guides stakeholders and the Project Team as to when, how and with whom consultations and exchanges should be undertaken throughout the life of the project. The Project Team will undertake a process of meaningful stakeholder consultation in a manner that provides stakeholders the opportunities to express their views on project design, risks, impacts and mitigation measures, and allows the Project Team to consider and respond to them. Consultation should be carried out on an ongoing basis as the nature of issues, impacts and opportunities evolves.

All efforts should be taken to work with the relevant stakeholders to design the engagement and consultation processes, including mechanisms of inclusiveness, respecting cultural sensitivities, and any required consent processes. Moreover, a general solicitation of feedback or input cannot be relied upon, nor accepted as the sole method of consultation. Stakeholder engagement may be minimal at certain times and intense at others depending on the issues and project phase. Targeted input from selected stakeholder groups may be needed at key points in project development and implementation.

If the project may involve indigenous people (IP) stakeholders, additional measures will be required to ensure their full and effective participation. If the project may affect IP rights and interests, lands, resources and territories, the FPIC process will need to be initiated early and respected throughout the project.

The aim of consultations is to inform the Project Team's decisions, where appropriate. Not all stakeholder groups can agree on project activities, their impacts and mitigation, so the goal of engagement is not always to achieve consensus but to hear from stakeholder groups and to take their comments and concerns into account in making project decisions.

Careful documentation of stakeholder consultations can demonstrate to stakeholders that their input has been considered and incorporated into the project. Summary reports of each consultation should be produced, circulated to participants, and publicly disclosed in an accessible manner. Any commitments made to the stakeholders should be carefully recorded. In addition, stakeholders

should be provided regular updates on the environment and social assessments and mitigation plans progress and modification to the project design.[40]

10.8 Engagement During Project Execution

Stakeholders should be regularly informed, consulted and engaged during project execution. The Project Team should engage with stakeholders in accordance with the guidelines set forth in the SEP.

10.8.1 Involve Stakeholders in Monitoring

It is important to involve affected stakeholders in monitoring the project's anticipated impacts and management measures throughout implementation. With the launch of project activities coupled with an urgency to complete work on schedule, there are risks that impact mitigation measures and other intended benefits may not be as effective as anticipated. Engagement during project implementation is essentially about assessing whether previously agreed measures are being implemented, working as intended, and addressing grievances and identifying alternatives where there are failings.[41]

ENDNOTES

[1] A prescreening will be conducted by the WWF safeguards coordinator on all proposed PIFs but is not considered part of the safeguards process formally for GEF projects.

[2] WWF-US has adopted this network draft policy, which is yet to be finalized for the WWF Network. This policy will be updated when the Network policy is finalized.

[3] Indigenous Peoples and Conservation: WWF Statement of Principles https://www.worldwildlife.org/publications/wwf-statement-of-principles-on-indigenous-peoples-and-conservation

[4] International Labor Organization (ILO)b Convention No. 169 https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C169

[5] United Nations Declaration on the Rights of Indigenous Peoples https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-rights-of-indigenous-peoples.html

[6] This is a standard of World Wildlife Fund, Inc., and has not been adopted by the WWF Global Network.

[7] For a tool for project practitioners that provides information about the right to FPIC and how it can be implemented in six steps, see FAO's Free Prior and Informed Consent—An Indigenous Peoples' right and a good practice for local communities https://www.un.org/development/desa/indigenouspeoples/publications/2016/10/free-prior-and-informed-consent-an-indigenous-peoples-right-and-a-good-practice-for-local-communities-fao/

[8] The World Health Organization Recommended Classification of Pesticides by Hazard https://www.who.int/ipcs/publications/pesticides_hazard/en/

[9] The Stockholm Convention on Persistent Organic Pollutants http://www.pops.int/TheConvention/Overview/TextoftheConvention/tabid/2232/Default.aspx

[10] International Code of Conduct on the Distribution and Use of Pesticides, Food and Agriculture Organization, 2003 http://www.fao.org/docrep/005/y4544e/y4544e00.htm

[11] Movable or immovable objects, sites, structures, and natural features and landscapes that have archeological, paleontological, historical, architectural, religious, aesthetic, sacred, or other cultural significance.

[12] WWF's Project and Program Standards http://wwf.panda.org/organization/programme_standards/

[13] The Categorization Memo will include project description; rationale for the project categorization; list of key environmental and social issues; details of the mitigation measures to bring the project into compliance with WWF's requirements; and an outline of any outstanding issues.

[14] An example of a tool is the Hydropower Sustainability Assessment Protocol which is an auditing too used to measure the environmental, social, technical financial and economic aspects of a project's sustainability performance.

[15] Dams and Development: A New Framework for Decision-Making. The Report of the World Commission on Dams https://www.internationalrivers.org/resources/dams-and-development-a-new-framework-for-decision-making-3939

[16] Brisbane Declaration https://www.conservationgateway.org/ConservationPractices/Freshwater/EnvironmentalFlows/MethodsandTools/ELOHA/Pages/Brisbane-Declaration.aspx

[17] These will also reflect national regulatory requirements, which may be relied on by the Project Team to the extent they meet the requirements of the SIPP.

[18] Green Climate Fund Environmental and Social Policy https://www.greenclimate.fund/documents/environmental-social-policy

[19] The purpose of the Ventures Committee is to provide WWF-US senior management with a forum to review, discuss and decide issues that cut across the organization or that present special opportunities or risks. Such issues might include those which represent a departure in practice for WWF, a new commitment of financial or staffing resources, a significant

institutional risk, or a potential impact on WWF's reputation or brand, such as: advocacy, corporate actions, certain financial arrangements and programmatic and marketing uses of the WWF logo: The Committee's composition includes the President/CEO, who will serve as Chair, and members of the Executive Team. Matters that may require Ventures Committee review must be brought to the attention of the President, or in his absence, the Chief Operating Officer, Chief Conservation Officer, or General Counsel, who will determine whether review by the Ventures Committee is warranted. The Ventures Committee will meet as needed and provide guidance, recommendations and, if appropriate, approval of the proposed course of action. The Committee may refer certain issues and proposals to the Board of Directors or particular board committee(s) for review and consultation, as appropriate. The President will report to the Executive Committee at least twice annually on the activities of the Committee.

[20] United Nations Convention on Biological Diversity https://www.cbd.int/

[21] The RAMSAR Convention on Wetlands https://www.ramsar.org/

[22] Convention on the Conservation of Migratory Species of Wild Animals https://www.cms.int/

[23] Convention on International Trade in Endangered Species of Wild Fauna and Flora https://www.cites.org/

[24] UNESCO World Heritage Convention https://whc.unesco.org/en/convention/

[25] United Nations Convention to Combat Desertification https://www.unccd.int/

[26] UN FAO International Plant Protection Convention https://www.ippc.int/en/

[27] The benefits that people derive from ecosystems. There are four types of ecosystem services: (i) provisioning services, which are the products people obtain from ecosystems (food, freshwater, wood and fiber, fuel); (ii) regulating services, which are the benefits people obtain from the regulation of ecosystem processes (climate regulation, flood regulation, disease regulation, water purification); (iii) cultural services, which are the nonmaterial benefits people obtain from ecosystems (aesthetic, spiritual, educational, recreational); and (iv) supporting services, which are the natural processes that maintain the other services (nutrient cycling, soil formation, primary production).at least twice annually on the activities of the Committee.

[28] High conservation values (HCVs) are biological, ecological, social, or cultural values that are considered outstandingly significant or critically important, at the national, regional, or global level. HCV categories include:
HCV1: Concentrations of biodiversity
HCV2: Landscape-level areas of significance
HCV3: Rare ecosystems
HCV4: Critical ecosystem services
HCV5: Community necessities
HCV6: Cultural values

[29] The mitigation hierarchy includes the three basic steps of avoidance, minimization, and offsets/compensation. The terminology varies from one country to another, and some definitions break the mitigation hierarchy into more steps—with both Business for Biodiversity Offsets Programme (BBOP) and the International Finance Corporation including a step titled "restoration/rehabilitation" before offsets and distinguishing between offsets and compensation as a last resort. WWF has applied the BBOP approach within the Biodiversity Offsets Position Paper (2012).

[30] WWF Policy on Biodiversity Offsets. Updated Guidance from WWF's involvement in the KBA Partnership and the publication entitled Guidelines on Business and KBAs: Managing Risk to Biodiversity https://portals.iucn.org/library/node/47660

[31] Landscape and seascape scale planning encompasses areas such as an eco-region or biome and broadens the zone concept to apply beyond international waters or a particular zoned area.

[32] IUCN Invasive Species Specialist Group http://www.issg.org/index.html

[33] Global Invasive Species Information Network http://www.gisin.org/DH.php?WC=/WS/GISIN/GISINDirectory/home_new.html&WebSiteID=4

34 The WHO Recommended Classification of Pesticides by Hazard http://www.who.int/ipcs/publications/pesticides_hazard/en/

35 Definition of stakeholders adapted from the IFC document Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (2007) page 10 https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_handbook_stakeholderengagement__wci__1319577185063

36 See Environmental and Social Standard 10. Stakeholder Engagement and Information Disclosure from the World Bank Environmental and Social Framework (2017) pages 97–100 http://www.worldbank.org/en/projects-operations/environmental-and-social-framework

37 WWF Cross-Cutting Tool for Stakeholder Analysis https://www.alnap.org/help-library/cross-cutting-tool-stakeholder-analysis

38 IFC Stakeholder Engagement Handbook pages 5–7 (See link in endnote 35)

39 IFC Stakeholder Engagement Handbook page 101 (See link in endnote 35)

40 IFC Stakeholder Engagement Handbook page 124 (See link in endnote 35)

41 IFC Stakeholder Engagement Handbook page 136 (See link in endnote 35)

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