



CRITICAL ECOSYSTEM PARTNERSHIP FUND – CARIBBEAN HOTSPOT PROJECT
(P173464)

Environmental and Social Management Framework

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List of Acronyms

AZE	Alliance for Zero Extinction
CANARI	Caribbean Natural Resources Institute
CEPF	Critical Ecosystem Partnership Fund
CI	Conservation International
CSAT	Collaborative Social Accountability Team
CSO	Civil Society Organization
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GBV	Gender-based Violence
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
IAS	Invasive Alien Species
INTEC	Instituto Tecnológico de Santo Domingo
KBA	Key Biodiversity Area
RIT	Regional Implementation Team
WHO	World Health Organization

1. INTRODUCTION

1.1 Project Description

The Critical Ecosystem Partnership Fund – Caribbean Hotspot Project is funded by the Policy and Human Resources Development Trust Fund at the World Bank and implemented by Conservation International (CI). The project has five components, which deal with, respectively: improving management of land and sea around priority Key Biodiversity Areas (KBAs); increasing the capacity of civil society organizations (CSOs) involved in conservation; increasing the capacity of the Regional Implementation Team (RIT) in leading and coordinating CSO conservation actions; strengthening CSO partnerships for conservation; and project management.

The project is an initiative of the Critical Ecosystem Partnership Fund (CEPF), a partnership of l'Agence Française de Développement, CI, the European Union, the Global Environment Facility, the Government of Japan, and the World Bank. The project will support the operations of the CEPF in seven countries of the Caribbean Islands Biodiversity Hotspot: Antigua and Barbuda; The Bahamas; the Dominican Republic; Haiti; Jamaica; Saint Lucia; and Saint Vincent and the Grenadines. CEPF is a donor partnership, which was created in 2000 to enable civil society to protect the world's biodiversity hotspots: biologically rich ecosystems that are essential to humanity, yet highly threatened. The Project Implementation Unit will be the CEPF Secretariat, administered by CI. As well as employing the CEPF Secretariat staff, CI also provides all necessary support functions to the CEPF Secretariat, including Human Resources and legal services. The World Bank is a founder member of CEPF. The objective of the Bank's involvement is to provide strategic assistance to non-governmental and private sector organizations for the protection of vital ecosystems in IBRD borrowing member countries that have ratified the Convention on Biological Diversity.

The project aims to improve the capacity of civil society organizations (CSOs) to reduce threats to globally important biodiversity in the Caribbean Islands Biodiversity Hotspot. It builds on actions, efforts and lessons learned under a previous phase of investment from 2010 to 2016 that require additional support for consolidation. It supports replication and scaling-up of good practice models, and incorporates lessons learned from the first phase to ensure enhanced implementation and continuity of action.

The project addresses the issue that globally important biodiversity of the Caribbean Islands Hotspot is threatened by overexploitation, habitat loss, and invasive alien species. To achieve this, it seeks to overcome two key constraints: first that civil society organizations' capacity to implement conservation actions is constrained by administrative, financial and technical limitations; and second that CSOs' ability to deliver conservation impact at scale is hindered by isolation, lack of coordination and weak dissemination of good practice. To this end, the details of the project's five components are:

Component 1: Increased Share of Land and Sea in and around Priority Key Biodiversity Areas under Improved Management. This component will support a grant mechanism that focuses on building capacity of CSOs to reduce threats to globally important biodiversity. At the site scale, grant-making will support conservation actions in and around 32 priority Key Biodiversity Areas

(KBAs): sites that contribute significantly to the conservation of global biodiversity. **Annex 1** provides a list of the KBAs along with maps of the location. Calls for proposals will be issued in a manner to attract project ideas that will cumulatively generate impacts in a clearly defined geographical area.

Some priority KBAs are too small to support globally important biodiversity and the ecological processes on which they depend into the long term. Consequently, there is a need for complementary conservation actions in the surrounding landscape to buffer KBAs from threats, maintain ecological connectivity and facilitate gene flow essential to ensure that species populations retain long-term viability. To this end, CEPF grant making will also target seven priority corridors, covering 2.3 million hectares, and engage CSOs able to work in these areas.

Component 2: Increased Capacity of CSOs in Conservation. This component will further strengthen the capacity of local, national and regional civil society in the conservation and sustainable use of biodiversity through targeted capacity development activities (such as classroom-based trainings in proposal design, project cycle management, gender mainstream, and managing environmental and social risks, hands-on mentoring, and development of online training materials) and dedicated knowledge exchanges.

This component will be executed through a combination of grants to CSOs, to build local, national and regional institutional capacity and foster stakeholder collaboration, and direct training and mentoring of CSOs by the Regional Implementation Team (RIT).

Component 3: Increased Capacity of RIT in Leadership and Coordination of CSO Conservation Actions. This component will strengthen the role and widen the responsibilities of the RIT¹ in the Caribbean Island Hotspot vis-à-vis the CEPF Secretariat. The RIT is central to the delivery of Components 1, 2 and 4, because it provides strategic leadership and local knowledge to build a broad constituency of CSOs working across institutional and political boundaries toward achieving the conservation goals described in the ecosystem profile. The RIT's major functions and specific activities will be based on approved terms of reference. Capacity building for the RIT will be provided by the CEPF Secretariat.

Component 4: Strengthened CSO Partnerships for Conservation. The conservation challenges that threaten globally important biodiversity in and around the priority KBAs tend to be too complex for any organization to solve working in isolation. In the context of the project, this requires CSOs to work with one another and in close coordination with local and national governments, private landowners and local communities to co-create analyses of and solutions to conservation challenges in non-confrontational ways. This approach, termed collaborative social accountability, will be adopted by the project to facilitate partnerships of CSOs and other stakeholders to design and implement conservation actions in and around priority KBAs.

In the Dominican Republic, Antigua and Barbuda, Jamaica and Saint Lucia, this component will be led by the Collaborative Social Accountability Team (CSAT), hosted at the Instituto Tecnológico de

¹ The Project Implementation Unit (PIU) is the CEPF Secretariat administered by CI. The PIU will work in collaboration with the Regional Implementation Team hosted at the Caribbean Natural Resources Institute (CANARI). CANARI is a regional technical non-profit organization that has been working in the Caribbean Islands for more than 20 years.

Santo Domingo (INTEC), with co-financing support and oversight from the World Bank's Global Partnership for Social Accountability. In The Bahamas, Haiti and Saint Vincent and the Grenadines, this component will be led by the RIT, learning from the experience of INTEC.

Component 5: Project Management, Including Monitoring and Evaluation. All activities related to administration and supervision of the project, communication, procurement and financial management as well as monitoring and reporting will be covered under this component. The Project Implementation Unit will be the CEPF Secretariat, working in partnership with the RIT, and in close collaboration with the CSAT. Under this component, communication on the project, including gathering lessons learned from the implementation will be financed.

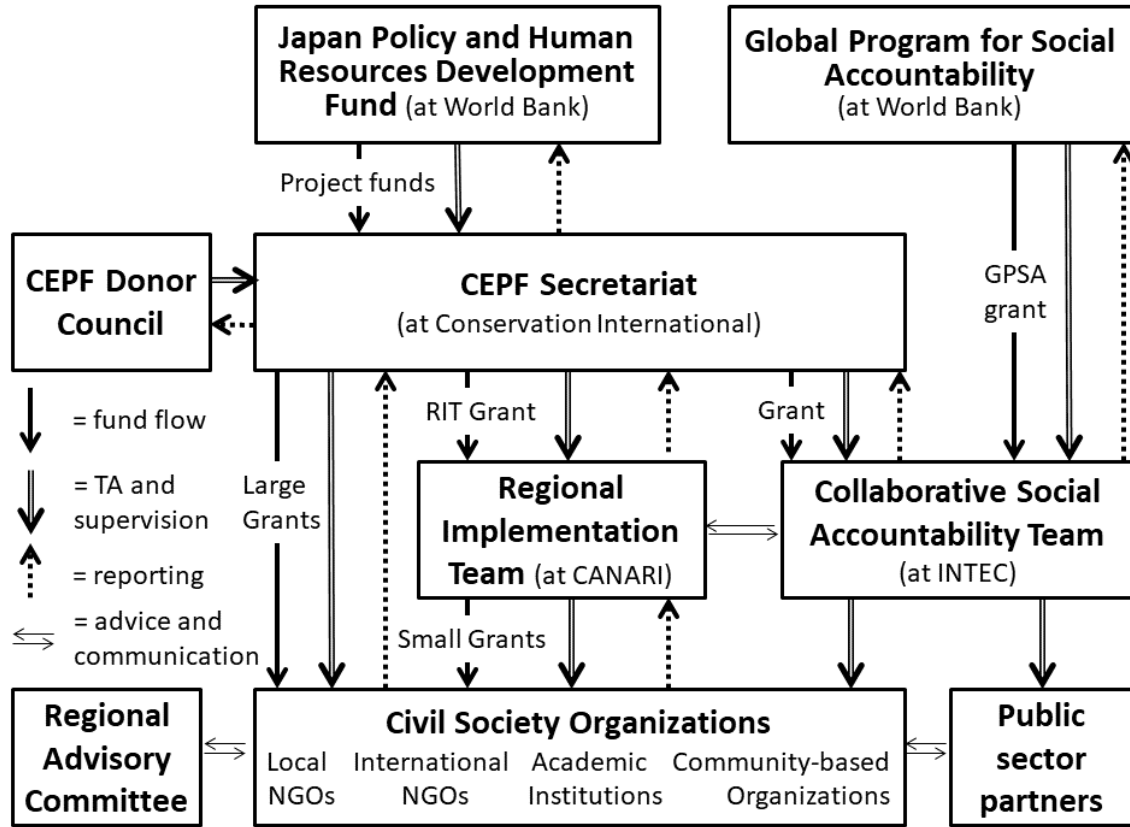
1.2 Purpose of the ESMF

As the location and design of the sub-projects are not known, an Environmental and Social Management Framework (ESMF) has been prepared. The ESMF establishes a process and defines the roles and responsibilities for addressing environmental and social issues for sub-projects from LOI submission through review and approval, to implementation. The ESMF describes the process to screen potential sub-projects for environmental and social issues and how to manage the adverse environmental and social impacts that may result from the sub-projects.

1.3 Institutional Roles and Responsibilities

The implementation of this ESMF requires involvement of several stakeholders each with different roles and responsibilities to ensure sound environmental and social management during project implementation, as shown in **Figure 1**.

Figure 1. Institutional Arrangements for the Project



CI will be responsible for the overall coordination and implementation of the project, including fiduciary management, monitoring and evaluation, and implementation of the project components.

The Project Implementation Unit will be the CEPF Secretariat, which is administered by CI on behalf of the donor partnership. The CEPF Donor Council will provide guidance to ensure that implementation in the Caribbean Islands is informed by, and in turn informs, implementation of CEPF investment programs in other biodiversity hotspot around the world.

Within the Caribbean Islands Hotspot, the CEPF Secretariat will be supported by a RIT, which will help engage and strengthen CSOs through provision of training, technical support and small grants. The RIT will be hosted at the Caribbean Natural Resources Institute (CANARI), a highly experienced institution working with CSOs in the Caribbean.

The CEPF Secretariat will also be supported by a CSAT, which will lead implementation of Component 4 of the project on strengthened CSO partnerships for conservation. The CSAT will be hosted at INTEC, an experienced institution in the region. The CSAT will lead implementation of Component 4 in the Dominican Republic, Antigua and Barbuda, Jamaica and Saint Lucia, while sharing experience with the RIT, which will lead in the remaining project countries.

The direct conservation actions in and around priority KBAs that will be implemented under the project will take place under Component 1, via sub-grants to community-based organizations,

local and international non-governmental organizations, academic institutions and other CSOs. These sub-grants will be of two types. “Large grants” will be awarded directly by the CEPF Secretariat, which will provide oversight and technical support to the sub-grantees, including on compliance with the ESSs. “Small grants” will be awarded by the RIT, which will supervise and support the sub-grantees, including with compliance with the ESSs. Small grants will primarily be used to engage lower capacity CSOs with less experience of receiving international donor funding, although they will also be open to higher capacity organizations, for actions that do not require a large budget.

Sub-grantees are encouraged to design and implement projects in close collaboration with public sector partners, especially national and sub-national government agencies.

The RIT will monitor the performance and impacts of small grants, while documenting and disseminating lessons learned. The CEPF Secretariat will monitor the performance of large grants, with assistance from the RIT. It will also monitor performance of the RIT and the small grants portfolio, via regular communication and semi-annual supervision missions.

The roles and responsibilities of the implementing agencies for the environmental and social process are set out in **Table 1**. Due to the different management and supervision arrangements for large and small grants, these are described separately. The individual roles and responsibilities of the CEPF Secretariat and RIT are given in **Annex 2**.

Table 1. Roles and Responsibilities of Parties Involved in the Environmental and Social Process

Role	Responsible party (large grants)	Responsible party (small grants)
Preparation and submission of LOI	Sub-grantee	Sub-grantee
Screening of LOIs for eligibility	CEPF Secretariat	RIT
Risk assessment of LOIs	CEPF Secretariat	RIT
Provision of guidance to sub-grantee on compliance with ESS requirements	CEPF Secretariat	RIT
Preparation of environmental and social instrument templates, guidance and worked examples	CEPF Secretariat	CEPF Secretariat
Preparation of environmental and social instruments required by applicable ESSs	Sub-grantee	Sub-grantee
Public consultation disclosure at the project level	CEPF Secretariat	CEPF Secretariat
Public consultation disclosure at the level of sub-grantees	Large Sub-grantee	Small Sub-grantee
Incorporation of components into sub-project design on strengthening legal and technical capacity to carry out key environmental and social assessment functions	CEPF Secretariat	RIT
Review and approval of sub-project proposal and environmental and social instruments	CEPF Secretariat	RIT

Role	Responsible party (large grants)	Responsible party (small grants)
Semi-annual reporting on compliance with ESSs	Sub-grantee	Sub-grantee
Monitoring and Supervision of sub-grantee compliance with ESSs	CEPF Secretariat (with assistance from RIT)	RIT (with supervision from CEPF Secretariat)

2. LEGAL AND INSTITUTIONAL FRAMEWORK

2.1 World Bank Environmental and Social Framework

The World Bank Environmental and Social Framework (ESF) protects people and the environment from potential adverse impacts that could arise from Bank-financed projects and promotes sustainable development. This framework provides broad coverage, including important advances on transparency, non-discrimination, social inclusion, public participation and accountability. The ESF also places more emphasis on building Borrower governments' own capacity to deal with environmental and social issues. The ESF enables the World Bank and Borrowers to better manage environmental and social risks of projects and to improve development outcomes. The ESF consists of:

- The World Bank's Vision for Sustainable Development.
- The World Bank's Environmental and Social Policy for Investment Project Financing, which sets out the requirements that apply to the Bank.
- The 10 Environmental and Social Standards (ESS), which set out the requirements that apply to Borrowers.
- Bank Directive: Environmental and Social Directive for Investment Project Financing.
- Bank Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups.

This Project will apply the ESF. **Table 2** depicts the ESSs that are anticipated to be relevant to the Project.

Table 2. World Bank ESSs Relevant to the Project

World Bank ESS	Relevance to the project	Justification
ESS1: Assessment and Management of Environmental and Social Risks and Impacts	Relevant	Although the project does not involve any civil works, it has a fairly large scope covering a large geographical area (1,171,033 hectares) of high biodiversity value in multiple locations throughout the Caribbean region. Restrictions on access or use can occur, resulting in loss of access to land and, potentially, some livelihood insecurity for the populations, albeit on a local scale. Environmental impacts are likely to be minor and reversible.
ESS2: Labor and Working Conditions	Relevant	The design of the project involves: direct workers, employed or engaged directly by the CEPF Secretariat; contracted workers, employed or engaged by the RIT, the CSAT and sub-grantees; and community workers, employed or engaged by sub-grantees in the context of sub-projects. Potential labor risks include discrimination, workplace injuries and the transmission of COVID-19.
ESS3: Resource Efficiency and Pollution Prevention and Management	Relevant	Invasive alien species (IAS) are a major threat to priority KBAs and globally threatened species in the Caribbean Islands. It is anticipated that sub-project activities may include control and eradication of IAS, and that, in some cases, this will require application of herbicides, rodenticides and other pesticides.

World Bank ESS	Relevance to the project	Justification
ESS4: Community Health and Safety	Relevant	It is anticipated that sub-project activities may include provision of training and support to security personnel (park guards, community rangers, etc.) involved in law enforcement. The activities of these personnel will require close oversight to avoid abuses of power. Also, application of pesticides involves health risks to workers and the public, which must be avoided or minimized. Finally, the project is being implemented in a region with a high risk of extreme weather events, which requires attention being given to emergency preparedness and response activities.
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Relevant	CEPF does not support land acquisition or resettlement (voluntary or involuntary) and no such activities will be supported under the project. In order to address unsustainable, illegal and destructive forms of natural resource use that threaten priority KBAs and globally threatened species, sub-projects may introduce or strengthen restrictions on access to legally designated parks and protected areas. These restrictions could potentially have adverse impacts, which need to be minimized or, where unavoidable, mitigated through provision of compensation or alternative livelihoods.

World Bank ESS	Relevance to the project	Justification
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	Relevant	The sub-activities will take place in a biodiversity hotspot. Of the 32 KBAs that have been identified as a priority for conservation, 17 KBAs are considered wholly irreplaceable on a global scale because they contain the only known populations of a globally threatened species. Since the sites are irreplaceable for Critically Endangered and Endangered species, they also qualify as Alliance for Zero Extinction (AZE) sites, the most urgent site level conservation priorities on a global scale. The Project will fund sub-projects to strengthen the protection of selected sites and build local capacity. The Project is expected to have positive conservation outcomes.
ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	Not relevant	There are no Indigenous Peoples in any of the seven Caribbean Islands countries covered by the project.
ESS8: Cultural Heritage	Relevant	One of the priority KBAs where the project will support activities is a mixed Natural and Cultural World Heritage Site. It is possible that sub-project sites may have tangible and/or intangible cultural heritage.
ESS9: Financial Intermediaries	Not relevant	The project design does not involve any financial intermediaries.
ESS10: Stakeholder Engagement and Information Disclosure	Relevant	There is also some concern about social risks in terms of exacerbation of existing patterns of social exclusion, participation and elite capture of benefits. Project activities, including sub-projects, will be implemented in places with stakeholders, including local communities, national and local authorities, and other CSOs. Stakeholder engagement is key to ensuring that the conservation actions supported under the project are environmentally and socially sustainable, and do not have any adverse impacts, whether anticipated or unanticipated.

2.2 National Policies and Legal Framework

The legal framework for the project covering the seven countries is given in in **Annex 3**. Annex 3 describes the legal policies of each country involved and how the policies respond to the requirements of the World Bank ESF. In general, it is perceived that, in the countries where sub-grants will be implemented, the national policies respond satisfactorily and in varying degrees to the ESF requirements. For further analysis in regard to gaps, see **Table 3**, which must be read together with Annex 3.

Table 3. Comparison of ESSs with the National Legal Frameworks in the Project Countries

ESS2: Labor and Working Conditions	
Aspects of ESS2 relevant to the project	<p>ESS2 requires that decisions relating to the employment or treatment of project workers will not be made on the basis of personal characteristics unrelated to inherent job requirements (e.g., gender, race, religion, sexual orientation, etc.) but be based on the principle of equal opportunity and fair treatment.</p> <p>ESS2 requires that no child under the legal minimum age or the age of 14 (whichever is lowest) be employed or engaged in connection with the project. Each of the project countries establishes a minimum legal age for employment. This is 14 or older in all countries.</p> <p>ESS2 also requires that no child under the age of 18 may be employed or engaged in connection with work that is likely to be hazardous, interfere with the child’s education or be harmful to the child’s health or physical, mental, spiritual, moral or social development.</p> <p>ESS2 imposes more general requirements related to occupational health and safety that apply to all project workers, not only those under the age of 18.</p> <p>With regard to ESS2 on Labor and Working Conditions, project workers will be based in the seven Caribbean Island countries targeted by the project, as well as in the United States of America and the United Kingdom, where staff of the CEPF Secretariat are based, and Trinidad and Tobago, where the head office of CANARI, the RIT, is located. In each jurisdiction, relevant labor laws are those related to conditions of employment (e.g., minimum wage, hours of work, minimum age, vacation and sick pay, maternity leave, etc.), anti-discrimination (i.e., protection from discrimination on the grounds of protected characteristics), industrial relations (e.g., trade union establishment, collective bargaining, arbitration of disputes, etc.) and occupational health and safety (i.e., health, safety and welfare in workplace settings). Each of these categories of law is relevant to different requirements of ESS2, and is addressed in the LMP for the project, as well as the separate LMP that will be prepared by the RIT, the CSAT and the sub-grantees.</p>

<p>Gaps in regard to ESS2</p>	<p>On the whole, the legal framework in the jurisdictions where project workers will be employed or engaged is adequate for addressing the requirements of ESS2. Nevertheless, there are gaps, both in terms of the legal framework itself and institutional capacity to ensure compliance with it, in several project countries. Specifically, there are gaps in anti-discrimination legislation in some project countries with regard to age, disability and, especially, sexual orientation. There are also some gaps in the legal protections given to children under the age of 18 from involvement in hazardous work, such as agriculture. Anti-discrimination legislation, in one form or another, exists in all project countries. In a few cases, such as Saint Lucia, specific laws have been passed, in other cases, general guarantees of equality are provided in the constitution. The protected categories defined by law are not, however, always as comprehensive as those required by ESS2. For instance, while discrimination on the grounds of race, religion, place of origin or sex is prohibited in all countries, such protections are not universal for age, disability and, especially, sexual orientation.</p> <p>As a result of shortcomings with the legal framework and its implementation in the project countries, it is unfortunately the case that children are still engaged in the worst forms of child labor, including in agriculture (including work in banana and sugar cane plantations) and commercial sexual exploitation. In some countries, for instance The Bahamas, there is no specific law on child labor, while the related laws that have been developed do not make specific reference to the relevant International Labor Organization Conventions on Minimum Age (C138) and the Elimination of the Worst Forms of Child Labor (C182). In Haiti, although the Labor Code prohibits children aged 16 to 18 from working at night in industrial settings or in establishments that serve alcohol, the types of hazardous work prohibited for children do not extend to agriculture: an environment where children can be exposed to hazardous chemicals, tools and weather. The Employment of Women, Young Persons and Children Act of Saint Vincent and the Grenadines has a similar gap</p> <p>In terms of minimum working age, there is a partial exception in Jamaica, where children over the age of 13 are permitted to engage in “light work”, such as household chores, supermarket packing and hairdressing. Also, in both Haiti and Saint Vincent and the Grenadines, there are discrepancies between the minimum age for work and the maximum age for compulsory education, leaving children without adequate protection from child labor.</p>
<p>Measures taken/to be taken</p>	<p>The project level LMP reflect measures. Also, separate LMP will be prepared by the RIT and by subgrantees to address these gaps and prior to the start of project activities in the respective countries.</p> <p>Sub-grantees will be asked to demonstrate that they have workplace environment policies that meet the requirements of ESS2 in relation to</p>

	<p>anti-discrimination. Sub-grantees that do not will be assisted to develop and implement appropriate policies that are aligned with ESS2.</p> <p>Although ESS2 permits children under the age of 18 to be employed or engaged in certain circumstances, this will only be permitted in exceptional circumstances under the project, and subject to rigorous scrutiny.</p> <p>If, for any reason, there are persons working for the project between the minimum age and the age of 18, the project will follow the requirements set forward in ESS2, section B: “Protecting the work force” paragraph 17-19.</p> <p>Sub-grantees and any third parties who employ or engage project workers will develop and implement procedures to establish and maintain a safe working environment, including that workplaces, vehicles, equipment and processes under their control are safe and without risk to health. This may require going beyond compliance with prevailing national legislation, due to the existence of gaps with regard to occupational health and safety. For instance, in Jamaica, there are no comprehensive industrial safety laws in place; a Health and Safety Act has been drafted but not yet enacted.</p>
ESS3: Resource Efficiency and Pollution Prevention and Management	
Aspects of ESS3 relevant to the project	The few activities that this standard is likely to apply to are ones under sub-projects that involve control or eradication of invasive alien species in the project countries.
Gaps in regard to ESS3	There is considerable variation among the project countries with regard to legislation governing the import, storage, manufacture, sale, transport, use and disposal of pesticides and other toxic chemicals, ranging from very detailed in Antigua and Barbuda to non-existent in Haiti
Measures taken/to be taken	Given the significant gaps that exist in the legal framework, it will be necessary to introduce additional measures in the site specific ESMPs, and to ensure compliance with the requirements of ESS3.
ESS4: Community Health and Safety	
Aspects of ESS4 relevant to the project	<p>The greatest project-related risks are associated with the implementation of sub-project activities at the community level, which could result in transmission of communicable diseases, such as COVID-19.</p> <p>The Caribbean Region is also at elevated risk of hurricanes, earthquakes and other natural disasters; some of the project countries have enacted laws on disaster preparedness and response.</p>
Gaps in regard to ESS4	All project countries have enacted laws on public health, which provide for control of infectious diseases. In line with these laws, specific guidelines and regulations have been introduced in response to the ongoing COVID-19 pandemic.

Measures taken/to be taken	<p>Compliance with prevailing guidelines and regulations will be a sine qua non for implementation of project activities.</p> <p>Guidelines include those of the Technical Note: “Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings March 20, 2020” and the ESF/Safeguards Interim Note: COVID-19 Considerations in Construction/Civil Works Projects.</p>
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	
Aspects of ESS5 relevant to the project	The only activities that this standard is likely to apply to are ones under sub-projects that introduce or strengthen restrictions on access to legally designated parks and protected areas.
Gaps in regard to ESS5	All project countries have laws that provide for the establishment of and regulation of activities within protected areas. Also relevant are the constitutions of several countries, which establish right of protection from deprivation of property.
Measures taken/to be taken	<p>Any activity that could require land acquisition and resettlement will be excluded out of the project list.</p> <p>A Process Framework is being developed for the project and to apply in case project’s activities cause restrictions on access to legally designated parks and protected areas.</p>
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	
Aspects of ESS6 relevant to the project	The standard is likely to apply to most activities under sub-projects, which will be implemented in and around priority KBAs. However, these are all expected to have positive conservation outcomes.
Gaps in regard to ESS6	Each country’s legal framework provides for regulation of natural resource exploitation which will be followed to avoid over harvesting of natural resources.
Measures taken/to be taken	ESMPs will reflect proper measures. Sub-projects will comply with measures in the ESMF, ESMPs, and prevailing regulations, in addition to the requirements of ESS6.
ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities. NOT RELEVANT to the project.	
ESS8: Cultural Heritage	
Aspects of ESS8 relevant to the project	ESS8 on Cultural Heritage is anticipated to apply to only a small proportion of sub-projects: those implemented at sites that contain tangible and/or intangible cultural heritage.
Gaps in regard to ESS8	All project countries have legal frameworks, consistent with ESS8, and in varying degrees, providing for preservation of national cultural, historical and/or natural heritage.
Measures taken/to be taken	Implement chance find procedure measures of the ESMF and that will be developed in site specific ESMPs, consistent with the requirements of ESS8.
ESS9: Financial Intermediaries NOT RELEVANT to the project.	

ESS10: Stakeholder Engagement and Information Disclosure	
Aspects of ESS10 relevant to the project	ESS10 recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.
Gaps in regard to ESS10	There is few, if any, information on the status of national legislation in terms of Stakeholder Engagement and Information Disclosure. However, the perception for some Caribbean countries is that there is a lack of appropriate channels through which citizens can voice their concerns about issues affecting their communities. Even when such channels are available, citizens may be unaware how to communicate their concerns or how to make specific requests ² .
Measures taken/to be taken	The project and its sub-projects will fully adopt, improve and implement the Stakeholder Engagement Plan developed for the project.

3. ENVIRONMENTAL AND SOCIAL PROCEDURES

3.1 Potential Environmental and Social Risks from the Project

The project has been rated as having a substantial social risk and a moderate environmental risk.

Environmental impacts are expected to be minimal, localized and reversible, as project activities are designed to generate positive resource conservation impacts. Nevertheless, certain activities may entail environmental risks, particularly those related to control and eradication of invasive alien species (IAS). The potential environmental risks include:

- **Pollution of natural ecosystems from pesticides.** IAS are one of the most severe threats to globally important biodiversity in the Caribbean Islands Hotspot. Some sub-projects are expected to aim to control or eradicate IAS, to reduce threats to globally threatened species and rehabilitate natural ecosystems. Although physical removal of IAS and/or integrated pest management will be employed wherever possible, following the Pest Management Procedures, in some cases there may be no viable alternative to use of pesticides. Pesticide storage and use presents risks to natural ecosystems, including through pollution of streams, wetlands and other freshwater ecosystems. Adverse impacts can include localized species extinctions, and loss of ecological balance.
- **Harm to non-target species during eradication or control of IAS.** Application of pesticides to eradicate or control IAS can have adverse consequences for native species of plants and animals if they inadvertently come into contact with the pesticide, either directly or by

² <http://documents1.worldbank.org/curated/en/946051538427057748/pdf/130411-WP-Supporting-Transparency-and-Accountability-in-Latin-America-and-the-Caribbean.pdf>

consuming plants and animals that have been treated with it. The most extreme impacts could include localized extinctions.

- **Conversion of habitats due to expansion of commercial agriculture or forestry plantations.** Some sub-projects are expected to promote wildlife-friendly production techniques for commercial agriculture (e.g., coffee) or forestry. These can improve the suitability of production landscapes for biodiversity, increasing the availability of habitats for plant and animal species, helping to buffer KBAs against edge effects and enhancing ecological connectivity at the landscape scale. These techniques can also provide landowners with price premiums or increased market access. There is a risk that, without adequate safeguards, landowners will be incentivized to expand the area under production, leading to loss of habitat.
- **Introduction of IAS.** Promotion of wildlife-friendly production techniques for agriculture and forestry plantations also carries a risk of introduction of IAS. This risk applies not so much to the use of non-native species in plantations, the invasive potential of which is generally well known, but rather to invasive alien pest species that could be introduced through the import of living plant material (i.e., seeds, seedlings and saplings), if biosecurity protocols are not correctly observed. If any sub-projects involve promotion of aquaculture, as a livelihood alternative for local people, this could also carry a risk of introduction of IAS, where non-native species are used.
- **Overharvesting of living natural resources.** Some sub-projects may seek to regulate or commercialize harvest of living natural resources, including fish from coastal ecosystems and non-timber forest products from forest ecosystems. This can provide additional, more diversified sources of income for local people, thereby creating an incentive to conserve natural ecosystems. However, if harvesting of living natural resources is not carefully managed, it can lead to overharvesting, resulting in declines in species populations, habitat degradation and loss of ecological balance.

The substantial social risk rating is related to the project's potential to restrict access to natural resources, in particular by supporting the creation or strengthened management of protected areas, and introduction of natural resource management regulations for communally managed land and water. In addition, the project will provide livelihood alternatives and other forms of development assistance to people, which has the propensity to exacerbate divides within communities. Finally, the project will work through CSOs, which have varying capacity to manage social risks and are likely to require some amount of capacity building and/or technical guidance. Key social risks include:

- **Hazards to project workers.** People employed or otherwise engaged to work on the project could be exposed to a number of hazards, which present risks of illness, injury or death. Field surveys or patrols in forest ecosystems carry a risk of falls in steep terrain, drowning in rivers and bites from venomous animals. Field work in coastal ecosystems carries a risk of drowning. Activities involving travel carry a risk of road traffic accidents or air accidents, in addition to exposure to infectious diseases, including COVID-19. In addition, project workers throughout the Caribbean Islands are exposed to an elevated risk of natural disasters, especially during the annual hurricane season. Project stakeholders may also face risks created by the relatively

high levels of crime and violence present in some of the jurisdictions in which the project will be implemented.

- **Hazards to local people.** Local people involved in project activities, for example as trainees, community rangers or meeting participants, could be exposed to a similar range of risks to those outlined above. A particular risk during the project period will be transmission of COVID-19 to remote rural communities, who may have limited access to healthcare. The risk of COVID-19 applies to all project activities involving local people, not only those related to sub-projects under Component 1.
- **Physical, psychological or sexual abuse of project workers.** Project workers could be exposed to physical, psychological or sexual abuse. Risks include both physical forms of abuse (such as violence and sexual assault) and non-physical forms (such as verbal abuse, bullying and unwanted sexual attention), with the latter being more prevalent in the workplace. These risks apply to workers on sub-projects, as well as staff employed and engaged by the CEPF Secretariat, the RIT and the CSAT. Special attention needs to be given to gender dimensions of the workplace environment, because women may be especially vulnerable to abuse.
- **Unfair treatment or discrimination of project workers.** As well as being exposed to abuse, project workers could be subjected to unfair treatment or discrimination on the basis of personal characteristics unrelated to job requirements, such as race, gender, religion and sexual orientation. These risks apply to workers on sub-projects, as well as staff employed and engaged by the CEPF Secretariat, the RIT and the CSAT.
- **Health impacts from unsafe storage or use of pesticides.** As described above, some sub-projects are expected to have recourse to the use of pesticides to control or eradicate IAS. As well as posing environmental risks, pesticides present risks of people (both project workers and local communities), if they are stored or used unsafely. The most serious risks include disease (including cancer) and death through poisoning.
- **Security personnel engaging in unlawful or abusive acts against local people.** It is anticipated that some sub-projects will aim to reduce threats to globally important biodiversity in and around priority KBAs by training, equipping and supporting security personnel, including both formal, government-employed park guards and community rangers. There is a risk that these personnel abuse their power and engage in unlawful or abusive acts against local people. Women, poor people and young people may be particularly vulnerable.
- **Transmission of COVID-19 or other communicable diseases.** Activities under all project components involve travel to and/or within the Caribbean Islands, including between countries and between urban centers and rural areas. Project staff and stakeholders may travel to participate in gatherings of large numbers of people, including workshops, seminars, community meetings and training events. Such activities have an elevated risk of transmission of COVID-19 or other communicable diseases. There is a particular risk of transmission of disease to remote, rural communities that may be particularly vulnerable, due to underlying health conditions and lack of access to healthcare.
- **Involuntary resettlement of people, due to physical and/or economic displacement.** This risk will be fully avoided because the project will not support any voluntary and/or involuntary resettlement. Resettlement activities, whether voluntary or involuntary, will be part of the negative list. In order to reduce threats to globally important biodiversity within and around priority KBAs, some sub-projects are anticipated to promote the creation or expansion of

protected areas. In other parts of the world, protected area establishment has been associated with involuntary resettlement of local people. This has high risks, including loss of income, diminished social cohesion, reduced economic resilience and loss of cultural identity.

- **Restrictions on access to natural resources within a protected area or communally managed property.** While the project will not lead to resettlement (resettlement will be part of the negative list), establishing protected areas or strengthening protected area management regulations or their enforcement can place limitations on access to natural resources, which can, in turn, have adverse impacts on local people. These impacts include loss of income, diminished social cohesion, reduced economic resilience and loss of cultural identity. Persons with a greater level of dependency on natural resources may be more severely impacted, and they may include some of the most vulnerable members of society (e.g., landless, women-headed households, elderly, etc.).
- **Disturbance or damage to cultural heritage.** Some sub-project activities may take place at sites with tangible or intangible cultural heritage. For instance, one of the priority KBAs is recognized as a UNESCO World Heritage Site based on its cultural values. Sub-project activities, in particular promotion of nature-based tourism, could inadvertently impact key elements of this heritage, for instance by damaging archaeological remains, or disturbing sites of historical or spiritual significance to local communities. Moreover, sub-projects that seek to preserve and promote awareness of cultural heritage could be seen as “exploiting” it by local people, if this is not done sensitively and a participatory manner.
- **Increased risk of elite capture of and/or social exclusion from project activities and/or benefits.** Given the scale and nature of the sub-projects, many will be unable to engage all members of target communities in project activities or ensure that all receive benefits, such as increased income or employment opportunities. In this context, there is a risk of elite capture, leading to vulnerable and disadvantaged groups being excluded from project activities and/or benefits. This risk will be mitigated via a robust stakeholder engagement process, which ensures that all vulnerable and disadvantaged groups are identified, consulted, and provided with opportunities to participate in and benefit from project activities.

Component-by-component assessment of environmental and social risks

Table 4 summarizes the main environment and social risks related to the project components, and the approach that will be adopted to assess and manage them. Due to the design of the project, which involves the award of grants for CSO sub-projects, it is not possible to assess risks in detail at this stage. Therefore, the ESMF presents a framework for screening individual sub-projects against the applicable ESSs and assessing the risks of each separately.

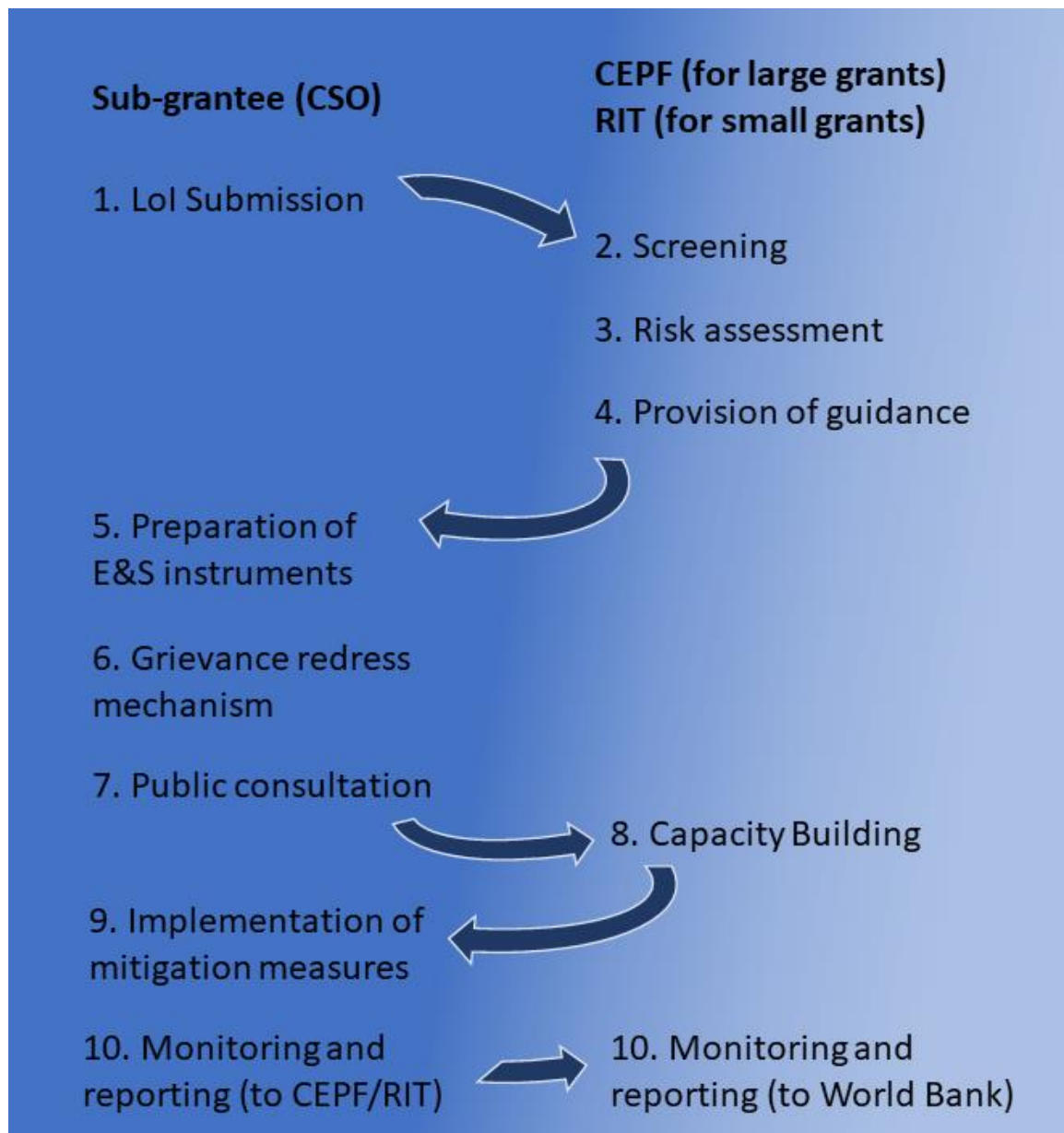
Table 4. Main Risks Related to Each Project Component

Component	Main risks
Component 1: Increased Share of Land and Sea in and around Priority Key Biodiversity Areas under Improved Management	This component will consist of sub-projects implemented by CSOs. Project workers could be exposed to hazards, abuse, unfair treatment or discrimination. This component will also involve travel by sub-grantee staff within the Caribbean Region, and various activities at the community level (meetings, surveys, trainings, etc.), which could present risks to both staff and community health and safety, especially as it relates to the spread of COVID-19. Moreover, the sub-project activities themselves entail environmental and social risks and impacts, including: restrictions on natural resource use; social exclusion and/or elite capture; use of pesticides; use of security personnel; disturbance to habitats and wildlife; possible disturbance to cultural heritage; overharvesting of living natural resources; and accidental introduction of IAS.
Component 2: Increased Capacity of CSOs in Conservation	This component will be implemented by the RIT. Project workers could be exposed to hazards, abuse, unfair treatment or discrimination. Moreover, this component will involve travel by RIT staff within the Caribbean Region and meetings with communities, which could present risks to both staff and community health and safety, especially as it relates to the spread of COVID-19.
Component 3: Increased Capacity of RIT in Leadership and Coordination of CSO Conservation Actions	This component will be implemented by the CEPF Secretariat. Project workers could be exposed to hazards (including the risk of contracting COVID-19), abuse, unfair treatment or discrimination.
Component 4: Strengthened CSO Partnerships for Conservation	This component will be implemented by the RIT and the CSAT. Project workers could be exposed to hazards, abuse, unfair treatment or discrimination. Moreover, this component will involve travel by RIT and CSAT staff within the Caribbean Region and meetings with communities, which could present risks to staff and community health and safety, especially as it relates to the spread of COVID-19.
Component 5: Project Management, Including Monitoring and Evaluation	This component will be implemented by the CEPF Secretariat. Project workers could be exposed to hazards, abuse, unfair treatment or discrimination. Moreover, this component will involve travel by CEPF Secretariat staff to the Caribbean Region and meetings with communities, which could present risks to both staff community health and safety, especially as it relates to the spread of COVID-19.

3.2 Environmental and Social Process

The process whereby environmental and social risks in relation to individual sub-projects are identified, assessed and managed is set out in **Figure 2**.

Figure 2. Environmental and Social Process for the Project



Step 1: LOI submission

Through an open call for proposals, CSOs will be invited to apply for sub-grants by submitting project concepts in the form of Letters of Inquiry (LOIs). Each LOI will include a description of the

project approach, project location and dates of implementation, as well as responses to the following specific questions:

- Will the proposed project support any physical construction or building of trails?
- Will the proposed project support any forestry activities?
- Will the proposed project involve activities that are likely to have adverse impacts on the local community?
- Will the proposed project result in the strengthened management of a protected area?
- Will the proposed project result in reduced or restricted access to the resources in a protected area?
- Will the proposed project result in removal or eviction of anyone from a protected area?³
- Will the proposed project involve use of herbicides, pesticides, insecticides or any other poison?
- Will the proposed project include any activities that might impact the health or safety of project staff or other people associated with the project?
- Will the proposed project involve the removal or alteration of any physical cultural resources (defined as movable or immovable objects, sites, structures and natural features and landscapes that have archeological, paleontological, historical, architectural, religious, aesthetic or other cultural significance)?⁴

If the sub-grantee⁵ answers yes to any of these questions, they will be required to provide a narrative description.

Step 2: Screening

Before proceeding to technical review by the Regional Advisory Committee, all LOIs will be screened by the CEPF Secretariat (in the case of large grants) or the RIT (in the case of small grants). During the screening step, LOIs will be reviewed against a set of eligibility criteria developed specifically for the project (**Annex 4**), which apply to the sub-grantee organization, the location of the sub-project and the types of activities being proposed. Based on the results of the screening, applications may be rejected or further assessed against project review criteria, which will be applied as a second step in the review process.

The eligibility criteria will include application of a “negative list” (also included as **Annex 5**). Applications for sub-projects proposing activities on the negative list will be either rejected or allowed to proceed only if the sub-project is redesigned to remove these activities. Ineligible activities (negative list) include:

- The use of child or forced labor.
- Purchase and use of formulated products that fall in the World Health Organization classes IA and IB or formulations of products in class II if they are likely to be used by, or be accessible

³ This activity is not supported under the project and is included on the negative list.

⁴ This activity is not supported under the project and is included on the negative list.

⁵ CSOs become grantees only after they sign a grant agreement; before that, they are applicants. For the purposes of this ESMF, the term “grantee” applies to both applicant and grantee.

to, lay personnel, farmers or others without training, equipment and facilities to handle, store and apply these products properly.

- Financing of elections or election campaigning.
- Funding salaries or salary supplements of government security personnel.
- Purchase of firearms or other weapons.
- Activities that contravene local laws related to purchase and consumption of tobacco, alcoholic beverages and other drugs.
- Manufacture of alcohol for local consumption and/or cultivation of crops for this purpose.
- Activities carried out in relation to the adjudication of lands under dispute.
- Physical resettlement of people (voluntary or involuntary).
- Purchase of land.
- Activities that have potential to cause adverse impacts to critical habitat.
- Conversion, deforestation or degradation of natural forests or other natural habitats, including, among others, conversion to agriculture or tree plantations.
- Activities related to commercialization of illegal timber and non-timber forest products.
- Construction and/or restoration of religious buildings.
- Removal or alteration of any physical cultural heritage property (includes sites having archeological, paleontological, historical, religious or unique natural values).

Step 3: Risk assessment

All sub-project applications that pass the screening step will undergo a risk assessment. This will take place at the LOI review stage, to allow sufficient time for measures to be agreed upon and implemented during sub-project preparation. The risk assessment will be based upon information provided in the LOI, plus communication with the sub-grantee to clarify any issues. The results of the risk assessment are not binding and can be revisited at any point during sub-project preparation and implementation, if new information comes to light or unanticipated risks and impacts emerge. This could lead to a determination that one or more ESSs no longer apply, or that one or more additional ESSs apply.

The CEPF Secretariat (in the case of large grants) or the RIT (in the case of small grants) will first review the LOI for potential E&S risks and impacts, as identified in Section 3.1. If additional risks and impacts are identified, these will be addressed. ESSs relevant to the sub-projects will also be identified.

Next, the CEPF Secretariat (or the RIT), will assess the magnitude of each risk/impact against criteria of probability and severity, as shown in Table 5. The probability of each risk/impact will be rated from “rare” (least probable) to “almost certain” (most probable), while the severity of each risk/impact will be rated from “negligible” (least severe) to “catastrophic” (most severe). Based upon these ratings, each risk/impact will be assigned a rating of “low”, “moderate”, “substantial” or “high”. The overall sub-project will take the highest risk rating for individual risks/impacts. For example, a project with three “low” risks and one “substantial” risk will be given the overall rating of “substantial”.

Table 5. Risk Assessment Matrix

Probability of risk/impact	Severity of risk/impact				
	Negligible	Minor	Moderate	Major	Catastrophic
Almost certain	Moderate	Substantial	Substantial	High	High
Likely	Moderate	Moderate	Substantial	Substantial	High
Possible	Low	Moderate	Moderate	Substantial	Substantial
Unlikely	Low	Low	Moderate	Moderate	Substantial
Rare	Low	Low	Low	Moderate	Moderate

All sub-grantees will be required to prepare: (i) a project-level Stakeholder Engagement Plan (SEP), including a Grievance Redress Mechanism (GRM) for stakeholders (NB all sub-project SEPs will follow the guidance outlined in the World Bank Technical Note, “Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings, March 20, 2020”). ; (ii) Labor Management Procedures, including a GRM for project workers and (iii) a Health and Safety Plan, including guidance on COVID-19 prevention. For sub-projects with an overall risk rating of “low”, the sub-grantee will only be required to prepare simplified versions of these three documents, whose templates are provided in the ESMF annex , and no additional environmental and social instruments. For sub-projects with an overall risk rating of “moderate”, sub-grantees will be required to prepare instruments for the applicable ESS(s), as shown in the **Table 6**. For sub-projects with an overall risk rating of “substantial”, sub-grantees will also be required to prepare instruments for the applicable ESS(s), as shown in the following table; they will also be subjected to enhanced monitoring and further due diligence. Applications for sub-projects with an overall risk rating of “high” will be rejected.

Table 6. Documentation Requirements by Risk Rating

ESS	Risk rating			
	Low	Moderate	Substantial	High
ESS1: Assessment and Management of Environmental and Social Risks and Impacts	None	Initial Environmental Examination / Environmental and Social Impact Management Plan	Environmental and Social Impact Assessment / Environmental and Social Management Plan	N/A (application rejected)
ESS2: Labor and Working Conditions	Simplified Labor Management Procedures (including GRM)	Labor Management Procedures (including GRM)	Labor Management Procedures (including GRM)	N/A (application rejected)
ESS3: Resource Efficiency and Pollution Prevention and Management	None	Pest Management Plan	Pest Management Plan	N/A (application rejected)

ESS	Risk rating			
	Low	Moderate	Substantial	High
ESS4: Community Health and Safety	Simplified Health and Safety Plan	Health and Safety Plan	Health and Safety Plan	N/A (application rejected)
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	None	Implementation of measures addressed in the Process Framework, adapted to the specific context	Implementation of measures addressed in the Process Framework, adapted to the specific context	N/A (application rejected)
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	None	Initial Environmental Examination / Environmental Management Plan	Environmental Impact Assessment / Environmental Management Plan	N/A (application rejected)
ESS8: Cultural Heritage	None	Cultural Heritage Plan	Cultural Heritage Plan	N/A (application rejected)
ESS10: Stakeholder Engagement and Information Disclosure	Stakeholder Engagement Plan (including GRM) proportionate to the specific environmental and social risks of the sub project.	Stakeholder Engagement Plan (including GRM)	Stakeholder Engagement Plan (including GRM)	N/A (application rejected)

Step 4: Provision of guidance

The CEPF Secretariat (or the RIT) will provide the sub-grantee with information on the relevant standard(s), from the World Bank website, together with internal guidance note(s) on the application of these standard(s) in the context of the CEPF project. The sub-grantee will also be provided with templates of any environmental and social instruments that need to be prepared in order to comply with the relevant standards. Additional guidance on compliance with the ESSs, including worked examples of instruments, will be made available on the CEPF website.

Step 5: Preparation of environmental and social instruments

Following the guidance provided by the CEPF Secretariat (or the RIT), the sub-grantee will prepare the required environmental and social instruments. An Environmental and Social Impact Assessment (ESIA) along with an Environmental and Social Management Plan (ESMP) shall be

prepared based on the outline given in **Annex 6**. Pest management procedures along with an outline for preparation of a pest management plan are in **Annex 7**. The template for chance find procedures is presented in **Annex 8** and the template for preparing a cultural heritage management plan is in **Annex 9**. Templates for developing labour management plans, health and safety plans and stakeholder engagement plans for sub-projects are provided in **Annexes 10, 11 and 12**. The template to adopt the Process Framework for sub-projects that will result in restriction of access is in **Annex 13**. Where appropriate, incorporation of gender-sensitive criteria to assess risks and impacts under the applicable ESS(s), and specific actions to close identified gender gaps, as well as indicators to monitor actions designed to address or narrow these gaps will be included. The CEPF Secretariat (or the RIT), will review these instruments prior to approving the grant for contracting. The final, approved versions will be publicly disclosed on the CEPF website.

Step 6: Sub-project grievance redress mechanism

Each sub-grantee will be responsible for establishing a GRM for project workers under ESS2, plus a separate GRM for community members and other stakeholders under ESS10, which will also meet the requirements of any other ESSs that apply to the sub-project. Guidance in terms of basic elements of these GRMs are provided in Figure 3, as well as in templates of the sub-grantee level LMP and SEP that are included as Annexes 10 and 12. Each GRM will provide a mechanism whereby affected persons may raise a grievance, at any time, and whereby this grievance may be considered and satisfactorily resolved. Where possible, each GRM will utilize existing formal or informal grievance mechanisms, supplemented as needed with sub-project-specific arrangements designed to resolve disputes in an impartial manner.

Regarding the GRM for project workers, the sub-grantee will make the mechanism accessible to all direct and contracted workers. The sub-grantee will inform workers, at the time of their employment, of the existence of the grievance mechanism and of measures to protect them against any reprisal for its use. Sub-grantees may utilize existing grievance mechanisms, provided they are properly designed, sufficiently responsive and readily accessible to project workers. Alternatively, existing mechanisms may be supplemented with project-specific arrangements.

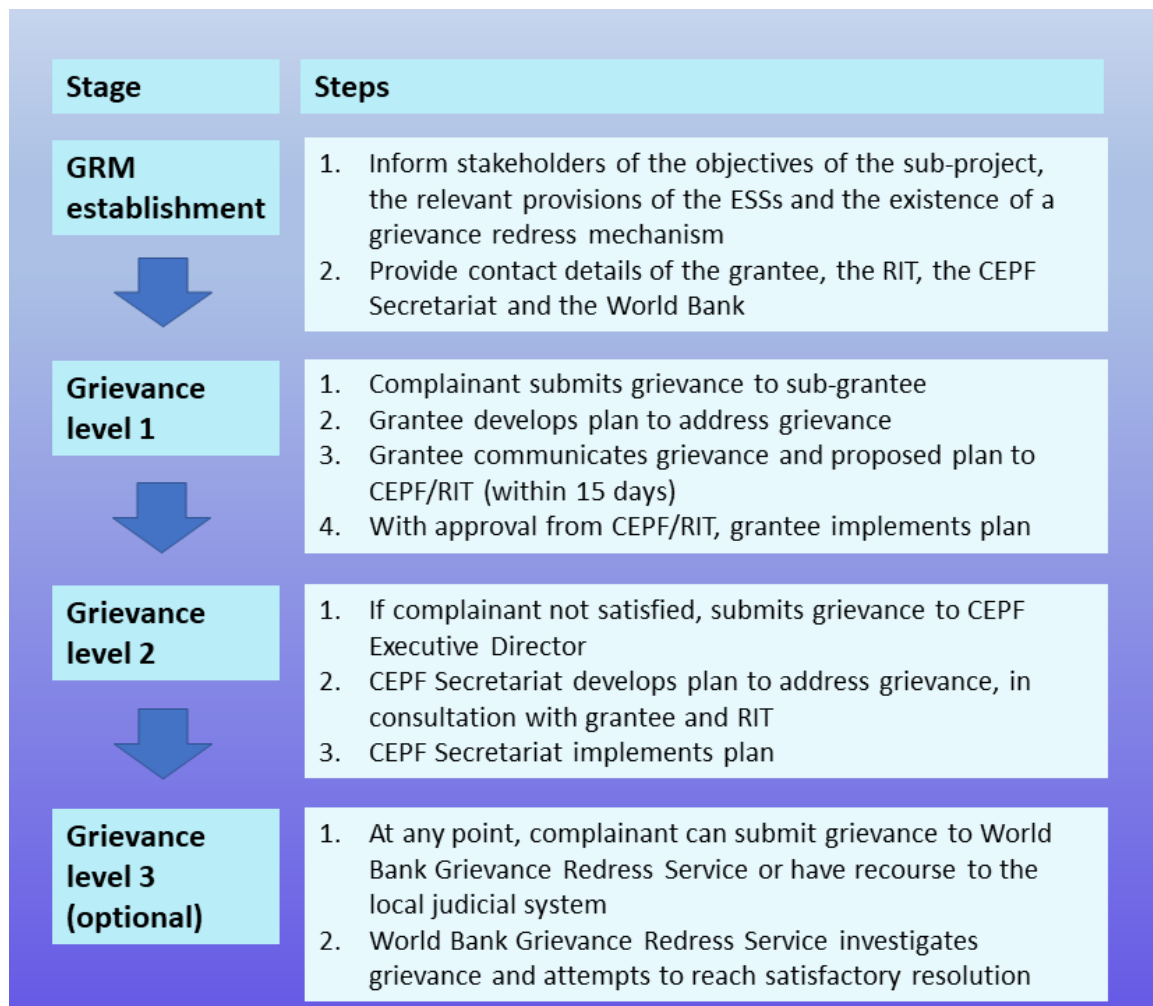
Regarding the GRM for community members and other stakeholders, the sub-grantee will inform stakeholders of the objectives of the sub-project, the relevant provisions of the relevant ESS(s), and the existence of a GRM. Contact information of the sub-grantee, the RIT and the CEPF Secretariat will be made publicly available using locally appropriate means (e.g., posters, community meetings, radio broadcasts, articles in print media, etc.).

In the first instance, grievances should be submitted to the sub-grantee. However, in case that the claimant is not comfortable in raising the matter directly with the sub-grantee, they should have the option of raising it with the RIT. Upon receiving a grievance, the sub-grantee (or RIT) should confirm receipt with the claimant.

All reported grievances will be treated confidentially, and there will be no retribution to the claimant by the sub-grantee, RIT or CEPF Secretariat. Retribution to a claimant by the sub-grantee will be grounds for suspension or termination of the grant.

Any grievances received by the sub-grantee must be reported to the CEPF Secretariat (or the RIT, in the case of small grants) within 15 days, together with a proposed plan to address the grievance. The CEPF Secretariat will maintain a log of grievances, which it will include in its annual reporting to the World Bank; serious incidents will be reported within 15 days. If complainants are not satisfied with the way in which their grievance has been handled by the sub-grantee, they will be given the opportunity to raise it with the CEPF Executive Director via the CI Ethics Hotline. The CI Ethics Hotline consists of a toll-free telephone line (+1-866-294-8674) and a secure web portal (<https://secure.ethicspoint.com/domain/media/en/gui/10680/index.html>) that allows grievances to be made anonymously. If the claimant is still not satisfied, following the response by the CEPF Executive Director, they will be given the option of submitting their grievance to the World Bank’s Grievance Redress Service but this should only be accessed after other GRM options have been exhausted by the claimant (Figure 3). The RIT and CEPF Secretariat will aim to resolve all grievances within 60 days of receipt.

Figure 3. Grievance Redress Mechanism for Sub-projects



The World Bank Grievance Redress Service (GRS)

The complainant has the option of approaching the World Bank, if they find the established GRM cannot resolve the issue. **It must be noted that this GRS should ideally only be accessed once the project's grievance mechanism has first been utilized without an acceptable resolution.** It can, however, be accessed anytime by project-affected people. World Bank Procedures require the complainant to express their grievances in writing to World Bank office in Washington DC by completing the bank's GRS complaint form, which can be found at the following link: <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service#5> . Completed forms will be accepted by email, fax, letter, and by hand delivery to the GRS at the World Bank Headquarters in Washington or World Bank Country Offices.

Email: grievances@worldbank.org
Fax: +1-202-614-7313
By letter: The World Bank
Grievance Redress Service (GRS)
MSN MC 10-1018 NW,
Washington, DC 20433, USA

Special provisions related to gender-based violence (GBV)

Special provisions will be made for grievances related to GBV, due to the need for complaints to be handled by persons with special training and adopting a survivor-centered approach. The CEPF Secretariat will maintain a list of GBV service providers, vetted by the World Bank, for each project country. This list will be provided to sub-grantees, prior to the start of sub-project activities. They will be required to include the contact details of the relevant GBV service provider in their GRMs for project workers and for community members and other stakeholders. Survivors of GBV will have the option of contacting the GBV service provider directly, who will, in-turn, inform the CEPF Secretariat, with the express consent of the survivor.

Step 7: Stakeholder engagement and public consultation

Consultations with key stakeholders, beneficiaries and affected people will be systematically carried out during preparation and implementation of each sub-project, in line with the requirements of ESS10. Meaningful consultations will be undertaken in a manner that provides affected communities and other stakeholders with opportunities to express their views on environmental and social risks and impacts of the sub-project, and mitigation measures (including the GRM), and allows the sub-grantee to consider and respond to them.

All sub-grantees will be required to develop a robust plan for engagement with affected communities and other stakeholders (template in Annex 12) and following worked examples and other guidance made available on the CEPF website). The plan will ensure that all vulnerable and disadvantaged groups are identified and consulted to reduce the chance of elite capture under the project. This plan must include a GRM for the project. The plan must also detail how the sub-grantee will monitor and evaluate the effectiveness of the stakeholder engagement activities. Where other environmental and social instruments are required for a sub-project, the

Stakeholder Engagement Plan may be incorporated into those instruments, to reduce workload for the sub-grantee, provided that the requirements of ESS10 are met.

This engagement will take advantage of the channels already established by CSOs, as well as the partnerships for conservation among CSOs and between them and communities, local and national government, and other stakeholders, which will be established under Component 4 of the project. A baseline survey will be conducted and followed up by mid-term and end-of-project surveys to assess the impact of the project on affected communities and their satisfaction with the performance of the project. For each sub-project, plans for stakeholder engagement will be set out in detail in the Stakeholder Engagement Plan, with its Grievance Redress Mechanism (GRM).

Consultations may take the form of one-on-one interviews, small-group consultations, public meetings or stakeholder workshops. Consultations may be in-person or virtual. Indeed, virtual meetings may be a necessity, as long as social distancing, travel restrictions and other measures to control transmission of the COVID-19 virus remain in place. For any possible face-to-face consultations, the sub-grantees will ensure that the project adheres to proper physical distancing protocols, such as those established by the World Health Organization (WHO) and the World Bank Technical Note, "Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings, March 20, 2020". Whichever forms of consultation are used, attention will be given to using local languages, and ensuring that voices of men and women are both heard. In some contexts, this may require holding separate consultations for men and women. Stakeholder engagement will also be used to ensure that all vulnerable groups within the project area are identified and consulted.

Step 8: Capacity building

The sub-grantee may include components in its sub-project to strengthen its legal or technical capacity to carry out key environmental and social assessment functions. If the CEPF Secretariat (or the RIT) concludes that the sub-grantee has inadequate legal or technical capacity to carry out such functions, it may require capacity strengthening activities to be included as part of the sub-project. Such a determination would usually be made during the review and due diligence process, prior to grant award, but it may also be made during project implementation, should a need be identified. Capacity building in ESS compliance may be carried out by the CEPF Secretariat, the RIT or third-party service providers approved by CEPF or the RIT.

Step 9: Implementation of mitigation measures

During implementation, the sub-grantee will be responsible for compliance with the applicable ESSs, including implementation of all agreed measures in the final sub-project proposal (which will form part of the grant agreement). These measures should be budgeted for and incorporated into the design of the sub-project as activities with related deliverables.

Table 7 identifies possible measures and actions to reduce potentially adverse environmental and social risks and impacts to acceptable levels. These measures and actions will be taken in accordance with the mitigation hierarchy, under which adverse impacts are first avoided, then reduced, then mitigated and finally (if any residual impacts remain) compensated for or offset.

These measures and actions will be elucidated in greater detail in the design of individual sub-projects, including, where required, in stand-alone environment and social instruments (ESIAs/ESMPs, Stakeholder Engagement Plans, etc.). In this regard, the **Table 7** can be considered an indicative list of the types of measures and actions that will be taken under the project.

Table 7. Potential Impacts and Mitigation Measures

Risk/Impact	Measure/Action			
	Avoidance	Reduction	Mitigation	Compensation
<i>Environmental Risks and Impacts</i>				
Pollution of natural ecosystems from pesticides	Use alternatives to pesticides, such as physical removal / trapping; avoid most hazardous chemicals	Use pesticides as a component of integrated pest management, following the Pest Management Procedures	Implement protocols on safe storage and handling of pesticides; deliver staff training; implement health and safety plan; liaise with local regulatory authorities where necessary	N/A
Harm to non-target species during eradication or control of IAS	Avoid pesticides with a broad range of target species / indiscriminate application	Minimize volume / area of treatment; combine with non-lethal trapping where possible	Establish captive populations of endemic and threatened non-target species during treatment	Implement conservation actions for non-target species at other locations
Conversion of habitats due to expansion of commercial agriculture or forestry plantations	Include provisions in certification schemes that prohibit conversion of critical habitat	Include provisions in certification schemes that minimize conversion of natural habitat	Incentivize conservation and/or restoration of critical and natural habitats	N/A
Introduction of IAS	Avoid import of biological material (seeds, seedlings, saplings, etc.) from overseas	Implement biosecurity protocols on import and use of biological material	Monitor for IAS establishment; implement rapid response to eradicate	N/A

Risk/Impact	Measure/Action			
	Avoidance	Reduction	Mitigation	Compensation
Overharvesting of living natural resources	Prohibit harvesting of certain species (e.g., species protected under national law, species with low reproductive rates)	Regulate seasons, areas, catch effort and/or gear; introduce quotas per household, community or cooperative	Improve habitat quality / area for harvested species	N/A
<i>Social Risks and Impacts</i>				
Hazards to project workers	Avoid scheduling project activities during hurricane season, especially ones involving boat travel or visits to remote sites	Use well maintained vehicles; limit boat travel to essential journeys only; avoid travel at night	Provide workers with personal protective equipment; provide field teams with safety, first aid and communication equipment; implement health and safety plan	Provide workers compensation insurance for all direct workers
Hazards to local people	Avoid scheduling travel or in-person gatherings during hurricane season	Minimize number of local people participating in sub-project activities (e.g. surveys, patrolling, etc.)	Provide training in health and safety to local people; provide personal protective equipment; implement health and safety plan	N/A
Physical, psychological or sexual abuse of project workers	Conduct background checks for new CEPF Secretariat staff, in compliance with applicable local law	Provide workers with workplace environment training	Establish and promote grievance mechanisms, including CI's Ethics Hotline; maintain a list of GBV providers in each country and ensure that their services are available to project workers	N/A

Risk/Impact	Measure/Action			
	Avoidance	Reduction	Mitigation	Compensation
Unfair treatment or discrimination of project workers	Provide project workers with copies of their employer's human resources policies	Provide managers with hiring / firing authority training in fair treatment / non-discrimination	Establish and promote grievance mechanisms, including CI's Ethics Hotline	N/A
Health impacts from unsafe storage or use of pesticides	Use alternatives to pesticides, such as physical removal / trapping; avoid most hazardous chemicals	Use pesticides as a component of integrated pest management	Implement protocols on safe storage and handling of pesticides; raise awareness among local communities; implement health and safety plan; liaise with local regulatory authorities where necessary	N/A
Security personnel engaging in unlawful or abusive acts against local people	Prohibit use of project funds to purchase weapons or support salaries of government security personnel through inclusion of such activities on the negative list; make reasonable inquiries to verify that individuals hired are not implicated in past abuses	Provide training for security personnel in the appropriate use of force, and appropriate conduct towards communities; implement codes of conduct	Establish and promote grievance mechanisms for local communities; maintain a list of GBV providers in each country and ensure that their services are available to stakeholders who may be the survivors of GBV perpetrated by security personnel	N/A

Risk/Impact	Measure/Action			
	Avoidance	Reduction	Mitigation	Compensation
Transmission of COVID-19 or other communicable diseases	To the extent possible, organize virtual meetings and monitor remotely; comply with applicable (e.g. WHO) guidance and advisories when scheduling travel or in-person gatherings	Minimize number of visits / visitors to remote, rural communities; minimize number and size of in-person gatherings	Provide project workers and local people with personal protective equipment, hand sanitizer and disinfectant; implement health and safety plan	N/A
Involuntary resettlement of people, due to physical and/or economic displacement	Prohibit support to sub-projects that involve purchase of land or resettlement of people through inclusion of such activities on the negative list	N/A	N/A	N/A
Restrictions on access to natural resources within a protected area or communally managed property	Use alternative area-based conservation measures, such as voluntary commitments	Minimize area / activities covered by restrictions; exempt community members in highly vulnerable groups	Develop and introduce restrictions in a participatory manner; establish and promote grievance mechanisms; implement other measures identified in the Process Framework	Provide affected people with cash / in-kind compensation or alternative livelihoods
Disturbance or damage to cultural heritage	Locate parking lots, campsites, trails and other visitor infrastructure away from areas with physical or intangible cultural heritage	N/A	Include Chance Find Procedures in all contracts relating to construction or civil works	N/A

Risk/Impact	Measure/Action			
	Avoidance	Reduction	Mitigation	Compensation
Risk of elite capture and/or social exclusion	Develop and implement robust Stakeholder Engagement Plans for the project and for each sub-project, which will ensure that stakeholders and vulnerable groups are adequately identified and consulted on project activities			

Step 10: Monitoring and reporting

During sub-project preparation, each sub-grantee will be required to define the steps it will take to monitor and evaluate the effectiveness of the agreed measures. This will be described in the relevant environmental and social instrument(s) and budgeted for. For example, monitoring may involve socio-economic surveys with a sample of households in each affected community, at the start, mid-point and end of the project, in order to measure impacts (planned and unanticipated) on human wellbeing. During sub-project implementation, the sub-grantee will then implement the agreed monitoring steps and report on them to the CEPF Secretariat (or the RIT). For sub-projects with an overall risk rating of “low” or “moderate”, sub-grantees will be asked to report in a dedicated section of their semi-annual performance reports. For sub-projects with an overall risk rating of substantial, sub-grantees will be requested to submit stand-alone environmental and social reports, following the template in **Annex 14**. Monitoring and reporting are described in greater detail in Section 3.7.

3.3 Project-level Grievance Redress Mechanism

Project-level GRMs for community members and other stakeholders

In addition to the GRMs that will be established for the individual sub-projects (see Section 3.2), there will also be a project-level GRM. Because project activities will involve visits to local communities by RIT and CSAT staff and meetings with local people, which could present risks to community health and safety, CANARI and INTEC have prepared simplified Stakeholder Engagement Plans, which include GRMs. These GRMs are streamlined, considering the limited scope of project activities at the community level and the low risk for adverse social impacts. The key measures will be to explain the purpose of any visit, explain the existence of the GRM and make available contact information of CANARI/INTEC and the CEPF Secretariat. This will be done through a printed handout or other locally appropriate means.

Project-level GRM for project workers

In addition to the GRM for local community members established under ESS10, a separate GRM will be established under ESS2 for project workers. This mechanism forms part of the Labor Management Procedures (LMP) for the project. The project-level GRM for project workers is based upon CI's existing Conflict Resolution and Formal Complaints policy.

Every project worker has the right to work in a safe, positive environment free of discrimination, harassment, and other illegal or unethical behavior. With this right comes the responsibility to act in accordance with CI's employment policies, core values, and Code of Ethics (included in the LMP for the project).

All project workers are encouraged to communicate with each other openly and resolve differences professionally, with the support of their supervisor and Human Resources staff if needed. Project workers who are CI employees also have the option of speak to one of six Respectful Workplace Advisors, who provide another avenue to share concerns and express challenges throughout the organization.

Reporting procedure for other employment concerns or questions not involving discrimination, harassment, or other illegal or unethical behavior

For employment concerns or questions that do not involve discrimination, harassment, or other illegal or unethical behavior described above, CI provides the following complaint procedure:

1. Resolve a conflict within the "chain of command": CI urges all employees to discuss their employment concerns or questions with their immediate supervisor. Supervisors are expected to establish effective two-way communication with their employees. If the supervisor has not resolved a problem to the satisfaction of the employee, the employee can approach either a higher-level supervisor within the "chain of command" or Human Resources.
2. Seek advice from Human Resources: Human Resources' goal is to guide employees to resolve issues on their own prior to filing a formal complaint. Human Resources may assist by providing advice and tools on effective communication or may serve as a mediator to help a supervisor and an employee, or two colleagues, come to a mutual decision.
3. File a formal complaint with Human Resources: In the event that an employee has tried to resolve a conflict with his/her supervisor or colleague and continues to be unsatisfied, then s/he can file a formal complaint directly to Human Resources, preferably in the form of a written statement. Examples of situations include an employee who believes that his/her supervisor is assigning an unreasonable amount of work without proper compensation, a supervisor who is not applying policies, procedures or guidelines in a fair and equitable way, or an employee who disagrees with their supervisor's assessment of their progress. Human Resources will review the complaint and arrange a meeting with the employee to determine appropriate next steps.

Reporting procedure for violation of CI's Anti-Discrimination and Equal Opportunity Employment Policy or Harassment Policy, or for other illegal or unethical behavior

When a project worker experiences, observes, or becomes aware of any conduct that may violate CI's policies, core values, or the Code of Ethics (e.g. as opposed to a routine disagreement as may take place from time to time in any office), he or she must report this conduct using the Reporting Procedure described here.

Examples of behavior that must be reported using this procedure include, but are not limited to,; (1) conduct that violates CI's Anti-Discrimination and Equal Opportunity Employment Policy and/or CI's Harassment Policy (which deals with all forms of harassment on the basis of sex); (2) lack of integrity in CI's accounting, auditing, and financial reporting controls, policies and procedures; (3) issues of legal or regulatory compliance; (4) substance abuse in the workplace; (5) theft; and/or (6) other individual or group behaviors that are inconsistent with CI's core values or Code of Ethics and which could pose a financial and/or legal risk to CI, or threaten CI's public image.

A project worker who experiences, observes, or becomes aware of discrimination, harassment, or other illegal or unethical conduct described above must immediately report the possible violation to the Human Resources or Risk Management teams.

A project worker who does not feel comfortable reporting to either of the above individuals may report the possible violation anonymously through the Ethics Hotline (see below).

CI will promptly and thoroughly investigate all complaints of discrimination, harassment, and other illegal or unethical behavior. CI will keep the investigation confidential to the extent possible and will disclose information relating to the investigation only on a need-to-know basis. If the investigation confirms that a violation has occurred, CI will take appropriate action to correct and prevent its recurrence. CI may put reasonable interim measures in place during an investigation, if CI determines that such measures would be in the project worker's and/or CI's best interest. These measures may include, but are not limited to, a leave of absence, suspension, or transfer of the project worker who reportedly violated the applicable policy or ethical standard.

CI's Ethics Hotline

All project workers employed or engaged by CI (as host of the CEPF Secretariat), CANARI or INTEC, whether as employees, consultants, interns or volunteers, will have access to the Ethics Hotline. They will be informed about the existence of the mechanism, explained how to use it and provided with the link to the hotline web portal.

The CI Ethics Hotline consists of a toll-free telephone line (+1-866-294-8674) and a secure web portal (<https://secure.ethicspoint.com/domain/media/en/gui/10680/index.html>) that allows grievances to be made anonymously. A project worker may submit a grievance through the website or by telephone in his/her local language at any time.

Project workers are given the option of reporting grievances anonymously and confidentially. When a project worker reports anonymously, he/she does not give his/her name or other identifying information. When a project worker reports confidentially, he/she provides his/her

name and preferred contact information. Many investigations can be completed more effectively and quickly when the reporter self-identifies, as it allows the investigators to directly seek clarification and ask additional questions.

Whether or not the project worker chooses anonymity, the Ethics Hotline will NOT send him/her emails about the grievance. Rather, he/she must log back into the system for progress updates. When the project worker initially reports a grievance, he/she will be provided with a report key and will be asked to create a password. This will allow him/her to return to the system and monitor the progress with resolving the grievance.

The Ethics Hotline system is managed by a third-party provider (NAVEX Global) with no connection to CI's network. It does not trace phone calls or use functionality such as Caller ID. In addition, the provider does not generate or maintain internet connection logs containing Internet Protocol (IP) addresses so no information linking the reporter's computer to the Ethics Hotline would be available if he/she chooses to report a grievance online. The third-party provider is contractually committed not to pursue a reporter's identity.

Any grievances received will be investigated by a team from CI's Human Resources department and General Counsel's Office. The review process typically includes:

- Receipt of the report is typically acknowledged within 2-3 business days. This confirmation and further communications will take place within the Ethics Hotline online portal or via phone. Additional time may be required for any translation needed to respond to the reporter in the submitted language.
- Determination if the grievance is an ethics or policy violation. A request for more information may be made to the reporter.
- If the grievance raised is not an ethics or policy violation, the reporter is informed of the most appropriate way to resolve the grievance, in line with the established procedure outlined above.
- If the issue raised is an ethics or policy violation, an investigation may be conducted by trained staff from the Human Resources and/or General Counsel's Office teams or external investigators or attorneys. A lead or leads from one of those groups will be responsible to move the case forward.
- Evidence is reviewed.
- Interviews are conducted with parties involved and witnesses, possibly in an off-site and confidential space or during off-hours, as needed.
- The lead will look for opportunities for acquiring more evidence and will also seek names of other potential witnesses or affected individuals.
- Report reviewed by CI's Chief People Officer and General Counsel and routed to the CEO of CI.
- Decision is made on next steps. If the investigation confirms that a violation has occurred, CI will take action, up to and including termination, as appropriate.
- The lead investigator communicates to the reporting party that the investigation has concluded.
- The Audit Committee of CI's Board of Directors is notified of all grievances.

Non-retaliation

CI strictly prohibits and will not tolerate any adverse action against an individual for:

- reporting conduct that they reasonably believe may violate CI's policies or Code of Ethics;
- filing a complaint of alleged discrimination or harassment with a government agency or court;
- assisting another individual in reporting conduct that may allegedly violate CI's policies;
- assisting another individual in filing a complaint of alleged discrimination or harassment with a governmental agency or court;
- cooperating in an investigation of any kind; or
- opposing alleged unlawful discrimination or harassment.

Any project worker who experiences, observes, or becomes aware of any conduct he or she believes may be retaliatory must immediately follow the reporting procedure described above.

3.4 Occupational Health and Safety

Most of the CEPF Secretariat staff working on the project will be based in the USA, with travel to the Caribbean Region to lead and supervise project activities. One CEPF Secretariat staff member is based in Cambridge, UK. Project staff employed or engaged by CANARI and INTEC will work from multiple locations in the Caribbean Region, including the CANARI head office in Port of Spain, Trinidad and Tobago and the INTEC office in Santo Domingo, Dominican Republic.

Health and safety plan for CEPF Secretariat

This section presents a summary of the Health and Safety Plan for the CEPF Secretariat, which is included in the Projects LMP.

CI administers CEPF on behalf of the global donor partnership. As such, the CEPF Secretariat staff are employees of CI and subject to its policies on health and safety. CI regards its personnel as its most valuable asset. Ensuring the safety and security, as well as the preparedness of those working for CI is one of the primary concerns of the organization. The General Counsel's Office, led by the General Counsel and supported by the Senior Director of Safety and Security, is responsible for managing risks to the organization's people, assets, operations, and reputation. To this end, CI has developed a safety and security plan for each country where it has offices.

CI employees are responsible for contributing to their own personal security by practicing basic security and situational awareness and, in high-risk locations, by adhering to location-specific personal security guidelines issued by CI. The Senior Director of Safety and Security is available to provide safety and security advice to project staff travelling to Caribbean countries, to assist with the management of critical incidents, and to provide training and support on safety and security topics.

The medical and security risk ratings for the countries where project activities will be implemented will be based on the assessments by International SOS. CEPF Secretariat staff traveling to these countries will be required to follow the travel advice prepared by International

SOS, which is summarized in the Health and Safety Plan. This travel advice covers COVID-19-related restrictions and is updated frequently.

CI also conducts its own risk assessments for countries where it has offices, which, in the context of the project, is the USA. The overall risk level for the USA is rated low, with the highest-rated risks being “terrorism – regional” and “terrorism – direct vicinity”. Even though country-level security risks are assessed as low, the alert level may increase due to changes in the threat environment.

There are three possible alert levels:

- **Normal:** This alert level describes a normal state of operations in the country in question; there are no specific events that have occurred or are predicted to occur that would signal a change in the threat environment.
- **Heightened:** An event has occurred or is predicted to occur that necessitates a higher state of alert and consequentially a change in CI’s normal operations.
- **Emergency:** An event or series of events has occurred or is predicted to occur that severely disrupts or directly affects CI’s operations in that country.

The decision to escalate the alert level can only be made by the Chief People Officer. All international travel will be suspended when the Chief People Officer has escalated the alert level in a country to “heightened” or “emergency”.

All CEPF Secretariat staff are provided with comprehensive health insurance, providing access to health care in the USA and internationally. Staff working from or visiting CI’s head office in Arlington, Virginia are advised that:

- For emergency medical issues call 911.
- For non-emergency health issues, contact International SOS (+1 215 942 8226) who will refer you to an appropriate medical provider and manage the direct billing agreement with the insurers. In addition, please contact Global Administration (ost@conservation.org) / Senior Director of Safety and Security (phorne@conservation.org).
- The nearest medical facility to the office is the Virginia Hospital Center, located at 1701 N George Mason Drive Arlington, VA 22205.
- Should you need to procure basic medicines or personal care products, the nearest pharmacy within walking distance from the CI office and local hotels is the CVS Pharmacy located at 2400 Jefferson Davis Highway, Arlington, VA 22202.

3.5 Gender and Sexual Exploitation and Abuse and Sexual Harassment

Gender policy for sub-projects

The ESMF gives special consideration to impacts and benefits for vulnerable social groups, particularly women. A gender-responsive approach, supportive of gender equality and women’s empowerment, will be adopted in the design, implementation and monitoring of the overall

project and of the individual sub-projects designed and implemented by CSOs under Component 1. All sub-grantees will be expected to comply with CEPF's Gender Policy (included in the project's LMP), and their performance with regard to gender mainstreaming will be tracked throughout the project by means of a Gender Tracking Tool.

Provisions for sub-projects regarding sexual exploitation and abuse and sexual harassment

As discussed in Step 6 of Section 3.2, special provisions will be made for grievances related to GBV. The CEPF Secretariat will maintain a list of GBV service providers, vetted by the World Bank, for each project country. This list will be provided to sub-grantees, who will be required to include the contact details of the relevant GBV service provider in their GRMs.

Anti-harassment policy for CEPF Secretariat

At the project level, all CEPF Secretariat staff will be required to comply with CI's anti-harassment policy (included in the project's LMP).

3.6 Capacity Building

The RIT will undertake an assessment of the institutional landscape and capacity development needs in each project country. Based on this, it will develop and deliver a comprehensive capacity building program during the lifetime of the project. Participants will include sub-grantees and CSOs that have the potential to become sub-grantees. Training sessions will be held in various formats, including workshops, lectures or hands-on activities in the field. The RIT will organize sub-grantee knowledge exchange workshops at project mid-point and end, to facilitate exchange of experience practice among sub-grantees that implement or have implemented projects in similar thematic areas, and to document and disseminate good practice.

Where specific needs in relation to compliance with ESS are identified, the CEPF Secretariat may deliver training directly, for individual sub-grantees or cohorts of sub-grantees, or engage third-party service providers with relevant expertise. This training could be classroom based, making use of training materials developed and refined over the years by CEPF (and adopting appropriate protocols to prevent transmission of COVID-19), or it could be online, using materials available on the CEPF website.

In addition to the capacity building that they will deliver directly, if the CEPF Secretariat or the RIT determines that a sub-grantee has inadequate legal or technical capacity to carry out key environmental and social assessment functions, it may require the sub-grantee to include explicit components in the design of its sub-project related to capacity building. This could involve training for existing project staff, resources to employ or engage staff or consultants with relevant expertise, or resources to develop institutional policies on, for instance, gender, anti-harassment or complaints and dispute resolution.

3.7 Monitoring and Reporting

The CEPF Secretariat, as the Project Implementation Unit, will have ultimate responsibility for monitoring compliance with the environmental and social requirements. This will apply both to

sub-projects implemented by CSOs under Component 1 and 2 and to activities implemented by the CEPF Secretariat, RIT and CSAT under Components 2, 3, 4 and 5. The CEPF Secretariat will be assisted in monitoring sub-grantees' compliance by the RIT. Roles and responsibilities will be clearly delineated, with the CEPF Secretariat leading on monitoring of large grants, with assistance from the RIT on a needs basis, and the RIT leading on monitoring of small grants, with supervision from the CEPF Secretariat.

The basis for monitoring compliance will be the agreed measures for consultation, avoidance and mitigation of adverse impacts and risks, and grievance resolution set out in the sub-project proposal and any standalone environmental and social instruments that have been prepared. When a grant is awarded, information on the applicable ESSs will be entered into Conservation Grants: CEPF's online grants management system. A reporting schedule will be created for each grant, and reflected in the grant agreement.

Every six months, the sub-grantee will be required to report on compliance with any ESSs that apply to the sub-project, by means of semi-annual environmental and social monitoring reports. For sub-projects with an overall risk rating of substantial, the environmental and social monitoring report must be submitted as a stand-alone document. For other sub-projects, it may be combined with the semi-annual performance reports that sub-grantees must submit. Each environmental and social monitoring report should contain a description of measures taken by the sub-grantee to comply with applicable ESSs over the previous six months, including a summary of stakeholder engagement activities and a grievance log in compliance with ESS10.

If a grievance is received related to the sub-project, the sub-grantee will develop a proposed plan of action for addressing it. The sub-grantee will communicate this to the CEPF Secretariat and the RIT within 15 days, together with the original grievance. Once the plan of action has been approved by the CEPF Secretariat and the RIT, the sub-grantee will implement it. Measures taken to address the grievance will be documented and reported on by the sub-grantee in subsequent environmental and social monitoring reports until the grievance is resolved.

In addition to monitoring sub-grantees' compliance with the ESS remotely, through review of proposals, instruments, reports and grievances, the CEPF Secretariat and RIT will carry out site visits to all sub-projects with an overall risk rating of substantial, plus a sample of sub-projects rated moderate or low. The CEPF Secretariat and the RIT will jointly develop a site visit plan each year, identifying which sub-projects will be visited, when and by whom. Site visits will involve interviews with sub-grantee staff and review of records on compliance with ESSs, as well as consultations with selected stakeholders, giving priority to project-affected parties. These consultations may take the form of structured or semi-structured interviews, focus group discussions, public meetings or workshops, and will adopt appropriate protocols to prevent transmission of COVID-19. Attention will be given to create a safe space, in which stakeholders can raise concerns without fear of reprisal. Particular attention will be giving to ensuring that voices of women and other vulnerable groups can be heard.

The CEPF Secretariat will maintain a log of grievances. Personally identifiable information (i.e., names, email addresses, identification numbers) related to complainants will be stored in hard copy in a secure location, for confidentiality and to comply with data protection legislation.

Pseudonyms (e.g., Person A, Person B, etc.) will be used in all records stored online, and in reporting to the World Bank.

At the end of each sub-project, the sub-grantee will be required to summarize the implementation of any measures required to comply with environmental and/or social standards that applied to the sub-project. This information will be provided in the final completion report; release of the final payment under the grant will be conditional upon the receipt of a satisfactory report. The CEPF Secretariat (or the RIT), will then complete an evaluation form, which includes a question about the sub-grantee's compliance with the ESSs.

While most of the grants awarded under the project will be for conservation actions in and around priority KBAs under Component 1, grants will also be awarded to CSOs for capacity building activities under Component 2, as well as to CANARI to play the role of the RIT and to INTEC to function as the CSAT. It is envisioned that the only standards that will apply to these grants will be ESS2 on Labor and Working Conditions, ESS4 on Community Health and Safety and EES10 on Stakeholder Engagement and Information Disclosure. It is anticipated that none of these grants will involve substantial or high environmental or social risks, and that the sub-grantees will report on their compliance with these standards as part of their routine reporting to the CEPF Secretariat (or to the RIT, in the case of small grants).

The CEPF Secretariat will report on compliance with ESSs under the project as part of its periodic reporting to the World Bank. It will keep detailed records of compliance by sub-grantees, the RIT and the CSAT, as well as in relation to activities implemented by the CEPF Secretariat. These records will be available for review by the World Bank Task Team, as well as by any internal or external consultants involved in evaluating the project. If any project worker contracts COVID-19, this will also be reported on in the CEPF Secretariat's periodic reporting to the World Bank, along with a description of measures taken by the project in light of the contraction of COVID-19. The CEPF Secretariat will also disclose information related to every sub-grant awarded, including all environmental and social instruments, summary information from the application, and the final completion report. Disclosure will be done online, through the Grantee Projects pages of the CEPF website⁶. No personally identifiable information about any sub-grantee or stakeholder will be publicly disclosed.

Table 8 sets out the monitoring measures that will be put in place for the project. In each case, the measure is described, the project actor responsible is identified, and a timeline is given.

⁶ <https://www.cepf.net/grants/grantee-projects>

Table 8. Environmental and Social Monitoring Measures for the Project

Monitoring measure	Description	Responsible party	Timeline
<i>Project-level</i>			
Environmental and social reporting	A report will be prepared that summarizes all ESSs triggered by sub-projects, the measures implemented by sub-grantees to comply with their requirements, and any grievances received	CEPF Secretariat	Six-monthly during project implementation
Grievance reporting	The CEPF Secretariat will maintain a log of grievances received and include it in its annual report to the World Bank on compliance with the ESSs	CEPF Secretariat	Six-monthly during project implementation
Accident and incidents	The CEPF Secretariat will inform the World Bank about any serious incidents (e.g., accidents, fatalities, etc.)	CEPF Secretariat	Within 15 days of being notified of the incident (or within 72 hours of the incident in the case of fatalities)
<i>Activities of sub-grantees</i>			
LOI submission	As part of their LOIs, sub-grantees will be required to answer a series of questions on the anticipated environmental and social risks and impacts of their proposed sub-projects	Sub-grantee	During sub-project preparation
Screening	Each LOI will be screened against the negative list and other eligibility criteria, to determine whether it is eligible	CEPF Secretariat / RIT (for small grants)	During sub-project preparation
Risk assessment	The magnitude of each risk/impact identified in the LOI will be assessed against criteria of probability and severity and a risk rating assigned	CEPF Secretariat / RIT (for small grants)	During sub-project preparation
Proposal preparation	Sub-grantees will be asked to provide additional information on risks/impacts and mitigation measures in relation to any ESSs that apply to their grants	Sub-grantee	During sub-project preparation

Monitoring measure	Description	Responsible party	Timeline
Proposal review	Each proposal will be reviewed to ensure that appropriate measures have been included to meet the requirements of applicable ESSs, and that any stakeholder consultations required have been carried out	CEPF Secretariat / RIT (for small grants)	During sub-project preparation
Environmental and social reporting	Sub-grantees will report on compliance with agreed measures and identify any new risks/impacts that have arisen	Sub-grantee	Every six months during sub-project implementation
Grievance reporting	Sub-grantees will inform the RIT and the CEPF Secretariat about any grievance received, together with a proposed plan to respond to it; a consolidated report of grievances received should be included in the sub-grantees semi-annual reporting to the CEPF Secretariat/RIT	Sub-grantee	Within 15 days of receipt of grievance
Site visits	Site visits will be conducted to a sample of sub-projects, and involve interviews with sub-grantee staff and review of records on compliance with ESSs, as well as consultations with selected stakeholders	CEPF Secretariat / RIT	At least once during sub-project implementation for all sub-projects with an overall risk rating of "substantial"
Final completion reporting	Sub-grantees will report on compliance with agreed environmental and social risk mitigation measures as part of their final completion reports	Sub-grantee	Within 60 days of end of sub-project
Evaluation	Each sub-project will be evaluated, including with respect to compliance with ESSs; evaluations will be confidential and will inform future applications by the sub-grantee	CEPF Secretariat / RIT (for small grants)	Within 90 days of end of sub-project

Monitoring measure	Description	Responsible party	Timeline
<i>Activities of RIT and CSAT</i>			
Proposal preparation	CANARI and INTEC will be asked to describe risks and mitigation measures in relation to ESS2 and ESS4 in their Labor Management Procedures and Health and Safety Plans	CANARI / INTEC	During project preparation
Proposal review	The RIT and CSAT proposals will be reviewed to ensure that appropriate measures have been included to meet the requirements of ESS2 and ESS4	CEPF Secretariat	During project preparation
Progress reporting	CANARI and INTEC will report on compliance with agreed measures and identify any new risks/impacts that have arisen	CANARI / INTEC	Every six months during project implementation
Grievance reporting	CANARI and INTEC will inform the CEPF Secretariat about any grievance received directly, reported by a sub-grantee or made by a project worker; a consolidated report of grievances received should be included in the sub-grantees semi-annual reporting to the CEPF Secretariat	CANARI / INTEC	Within 15 days of receipt of grievance
Supervision missions	The performance of the RIT in monitoring and ensuring sub-grantees' compliance with ESS requirements will be reviewed as part of each RIT supervision mission	CEPF Secretariat	Twice per year during project implementation
Independent evaluation	The performance of the RIT in monitoring and ensuring sub-grantees' compliance with ESS requirements will be looked at as part of the independent evaluation of the RIT	Independent consultant	During final year of project

3.8 Implementation Schedule and Cost Estimates

Table 9 provides an implementation schedule and cost estimate for all three aspects of ESS compliance: mitigation measures; monitoring measures; and capacity development measures.

Table 9. Implementation Schedule and Cost Estimate for Mitigation, Monitoring and Capacity Development Measures

Action	Implementation Schedule	Cost Estimate	Funding Source
<i>Mitigation Measures</i>			
Screening of sub-project applications	Within 90 days following each call for proposal deadline	Estimated 5% of CEPF Secretariat and RIT budgets: \$180,000	Project budget
Provision of guidance to sub-grantees on impacts/risks and mitigation measures	Within 120 days following each call for proposal deadline	Estimated 5% of CEPF Secretariat and RIT budgets: \$180,000	Project budget
Review of grievances, including field visits to establish facts and monitor implementation of agreed response	Initial review within 5 working days of receipt; field visit (if required) within 90 days of receipt	Estimated 2% of CEPF Secretariat and RIT budgets: \$72,000	Project budget
Implementation of mitigation measures for sub-projects	Throughout project	Estimated 10% of total budget of sub-projects: \$880,000	Project budget
<i>Monitoring Measures</i>			
Review of environmental and social monitoring reports submitted by sub-grantees	Within 30 days of report submission	Estimated 3% of CEPF Secretariat and RIT budgets: \$108,000	Project budget
Site visits to selected sub-projects	From year two of the project onwards	Estimated 5% of CEPF Secretariat budget and 15% of RIT budget: \$330,000	Project budget
Monitoring of grievance email accounts	Throughout project	Negligible	N/A
Review of final completion reports submitted by sub-grantees	Within 30 days of report submission	Estimated 2% of CEPF Secretariat and RIT budgets: \$72,000	Project budget
Preparation of sub-project evaluation reports	Within 90 days of end of sub-project	Estimated 3% of CEPF Secretariat and RIT budgets: \$108,000	Project budget
RIT supervision missions	Twice per year	Estimated 10% of CEPF Secretariat budget: \$330,000	Project budget
Independent evaluation of the RIT	During final year of project	Estimated \$30,000	Project budget

Action	Implementation Schedule	Cost Estimate	Funding Source
<i>Capacity Development Measures</i>			
Design and delivery of RIT training	Within 90 days of start of RIT grant	Estimated 4% of CEPF Secretariat budget: \$84,000	Project budget
Development of online guidance and training materials for sub-grantees	Initial development during first year of project; update during years two to four	Estimated 1% of CEPF Secretariat budget: \$21,000	Project budget
Design and delivery of training for sub-grantees	On as-needs basis throughout project	Estimated 5% of RIT Secretariat budget: \$105,000	Project budget
TOTAL		\$2,170,000	

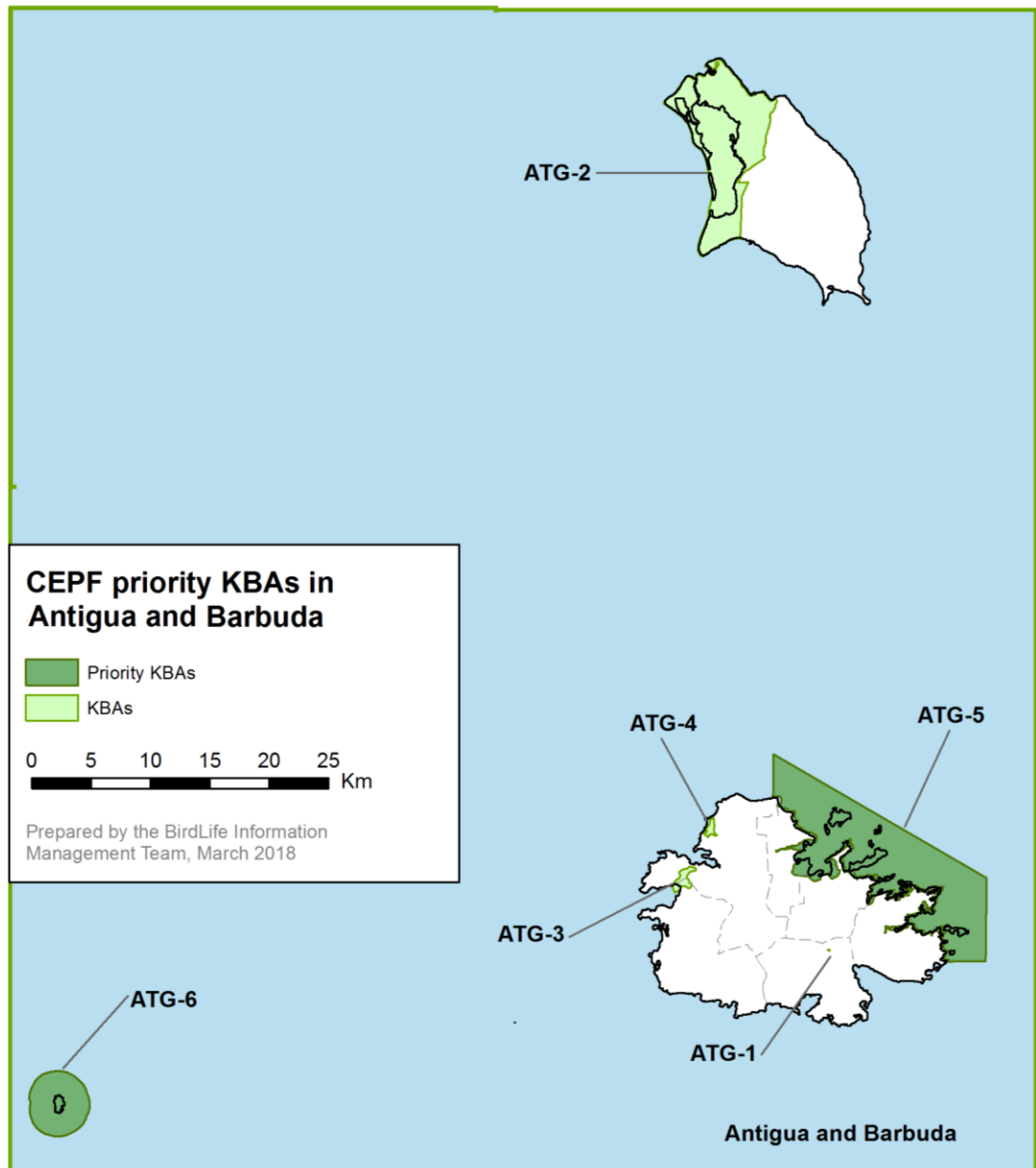
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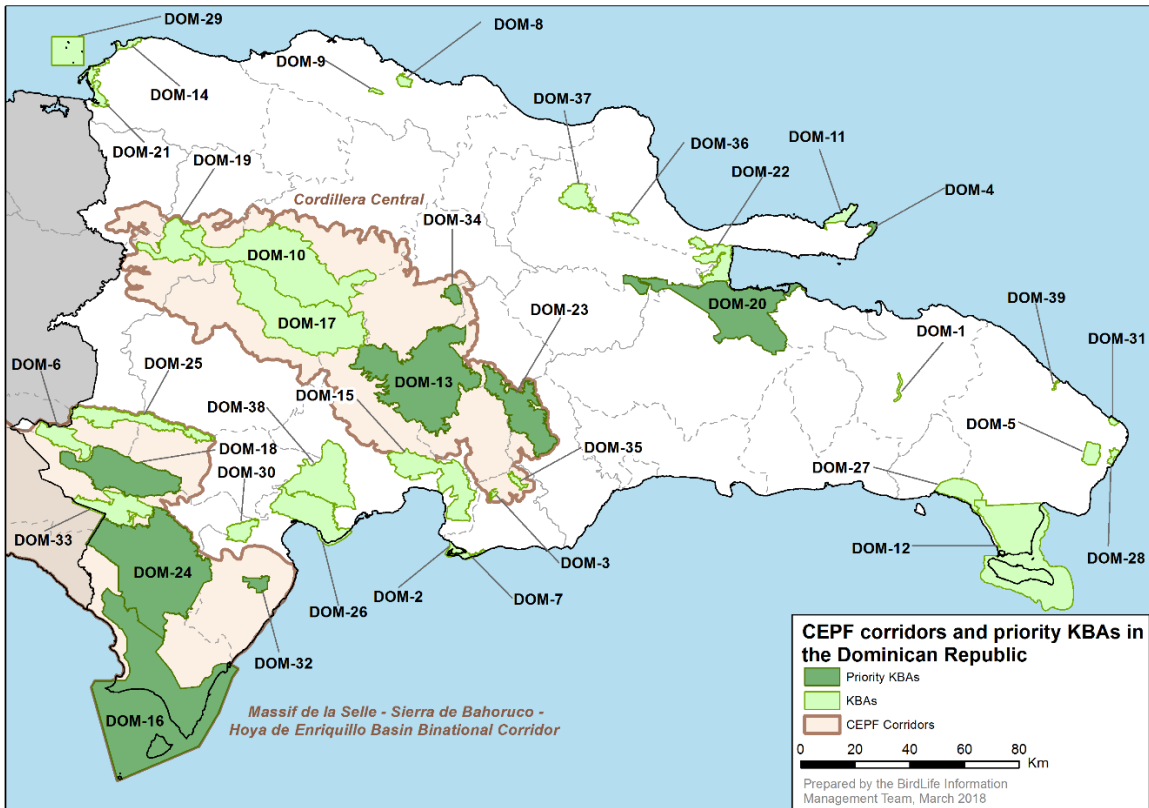
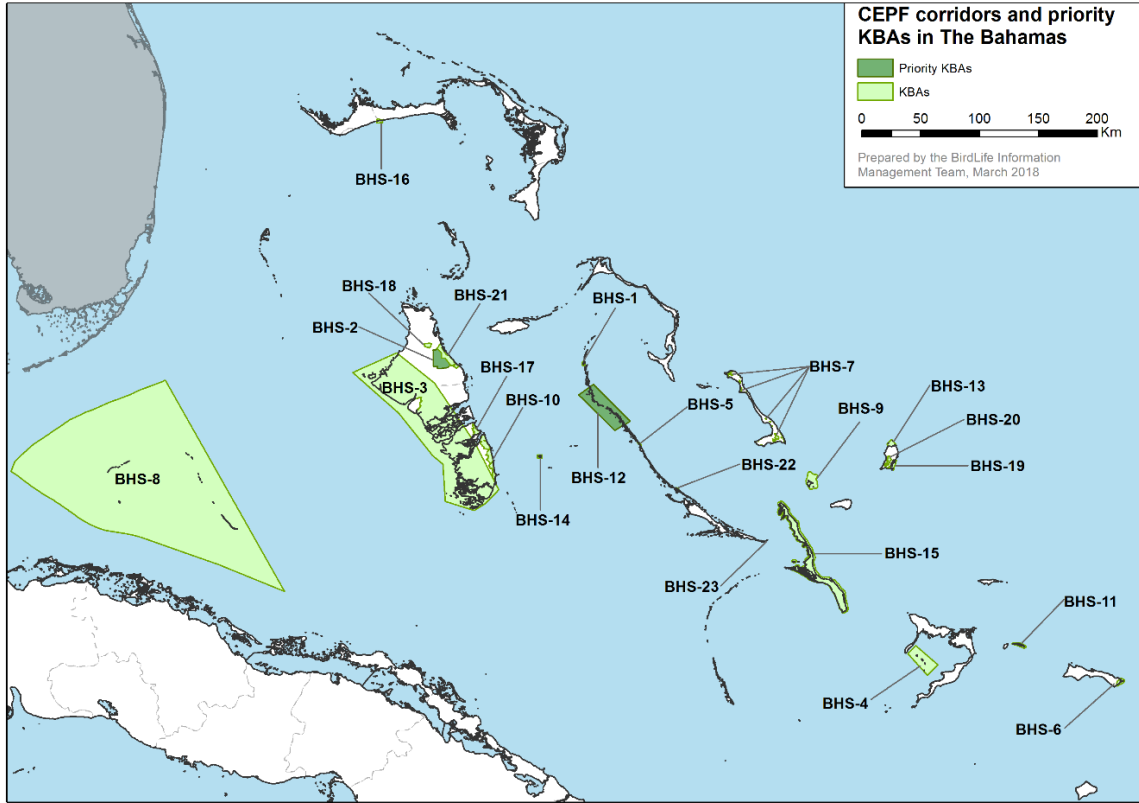
Annex 1: List of KBAs

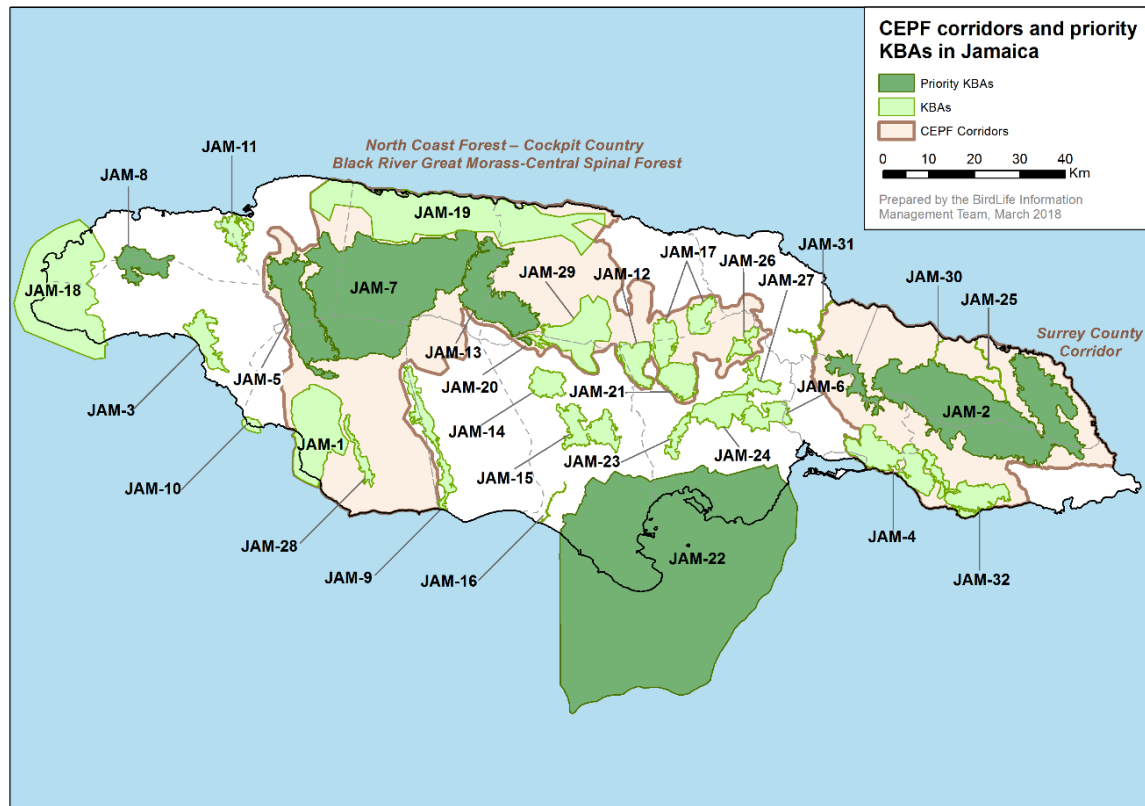
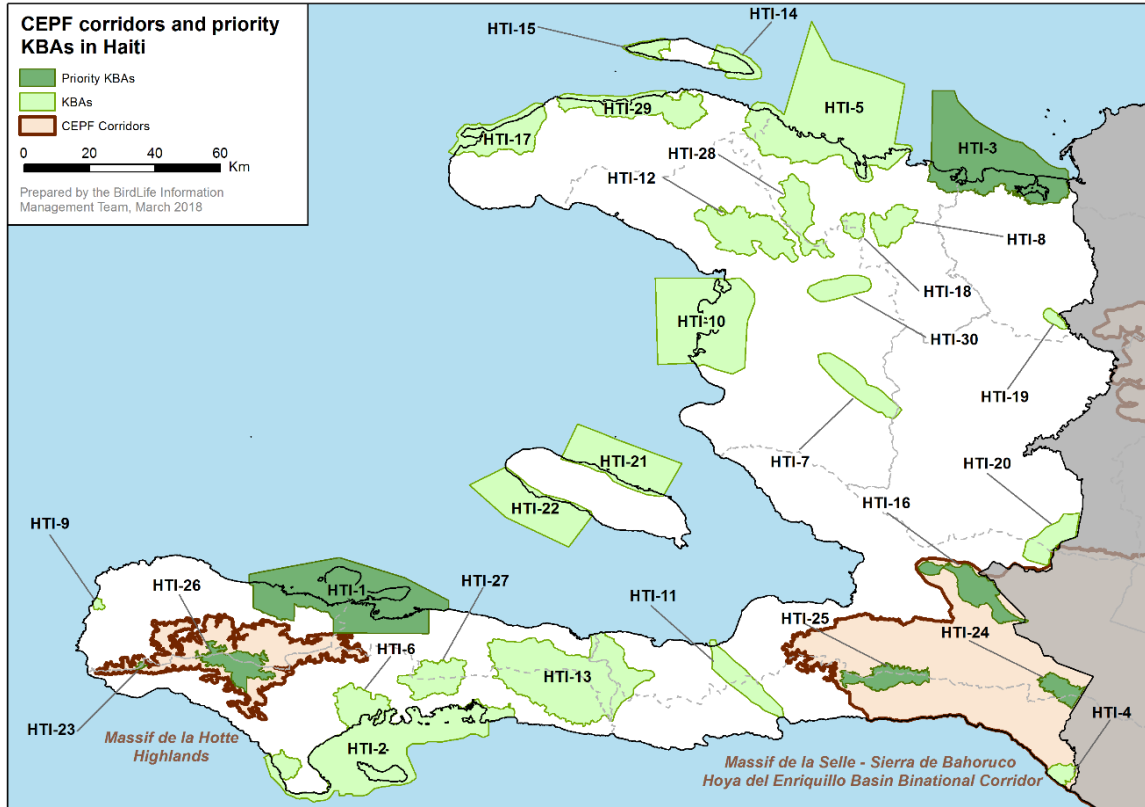
Project activities will take place in and around 32 priority KBAs, distributed across seven countries in the Caribbean Islands. The following table and maps show the location of these priority KBAs.

	Code	Site	Country	Land Area (ha)
1.	ATG-5	North East Marine Management Area and Fitches Creek Bay	Antigua and Barbuda	11,115
2.	ATG-6	Redonda	Antigua and Barbuda	2,130
3.	BHS-2	Andros Blue Holes National Park	Bahamas	13,479
4.	BHS12	Exuma Cays Land and Sea Park	Bahamas	60,223
5.	DOM-4	Monumento Natural Cabo Samaná	Dominican Republic	931
6.	DOM-13	Parque Nacional Dr. Juan Bautista Pérez Rancier (Valle Nuevo)	Dominican Republic	90,915
7.	DOM-16	Parque Nacional Jaragua	Dominican Republic	156,092
8.	DOM-18	Parque Nacional Lago Enriquillo e Isla Cabritos	Dominican Republic	40,575
9.	DOM-20	Parque Nacional Los Haitises	Dominican Republic	63,408
10.	DOM-23	Parque Nacional Montaña La Humeadora	Dominican Republic	30,646
11.	DOM-24	Parque Nacional Sierra de Bahoruco	Dominican Republic	109,423
12.	DOM-32	Refugio de Vida Silvestre Monumento Natural Miguel Domingo Fuerte (Bahoruco Oriental)	Dominican Republic	3,362
13.	DOM-34	Reserva Científica Ébano Verde	Dominican Republic	2,999
14.	HTI-1	Aire Protégée de Ressources Naturelles Gérées de Baradères-Cayemites	Haiti	87,920
15.	HTI-3	Aire Protégée de Ressources Naturelles Gérées des Trois Baies	Haiti	75,500
16.	HTI-16	Lac Azuéi – Trou Caiman	Haiti	16,317
17.	HTI-23	Parc National Naturel de Grand Bois	Haiti	372
18.	HTI-24	Parc National Naturel Forêt des Pins-Unité 1	Haiti	6,799
19.	HTI-25	Parc National Naturel La Visite	Haiti	11,455
20.	HTI-26	Parc National Naturel Macaya	Haiti	13,486
21.	JAM-2	Blue and John Crow Mountains Protected National Heritage and surroundings	Jamaica	60,497
22.	JAM-5	Catadupa	Jamaica	15,785
23.	JAM-7	Cockpit Country	Jamaica	64,139
24.	JAM-8	Dolphin Head	Jamaica	5,389
25.	JAM-13	Litchfield Mountain - Matheson's Run	Jamaica	16,013
26.	JAM-20	Peckham Woods	Jamaica	239
27.	JAM-22	Portland Bight Protected Area	Jamaica	197,957

	Code	Site	Country	Land Area (ha)
28.	LCA-2	Castries and Dennery Waterworks Reserve and Marquis	Saint Lucia	7,886
29.	LCA-4	Mandelé Protected Landscape	Saint Lucia	2,561
30.	LCA-6	Pointe Sable	Saint Lucia	2,050
31.	VCT-1	Chatham Bay, Union Island	Saint Vincent and the Grenadines	350
32.	VCT-3	Cumberland Forest Reserve	Saint Vincent and the Grenadines	1,017
Total				1,171,033

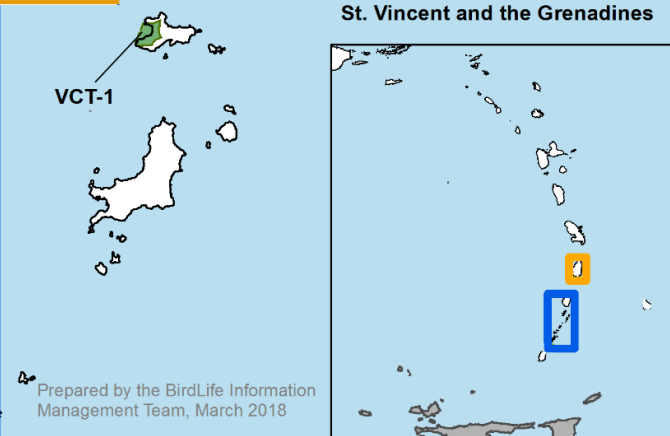
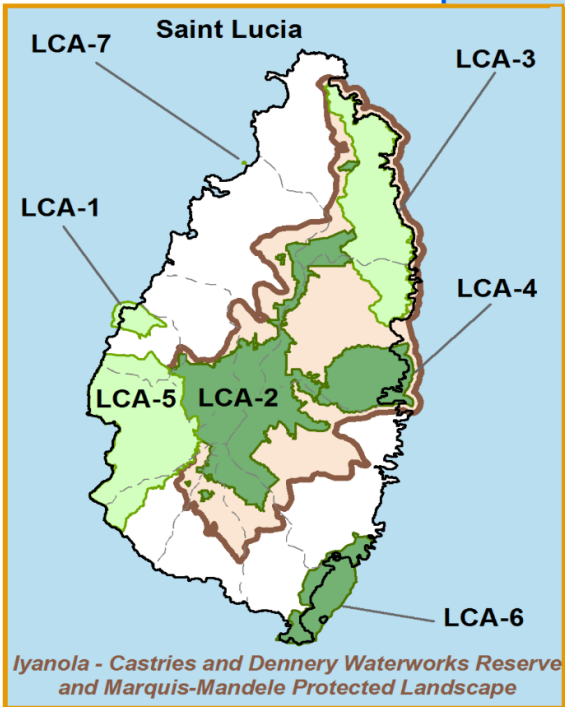
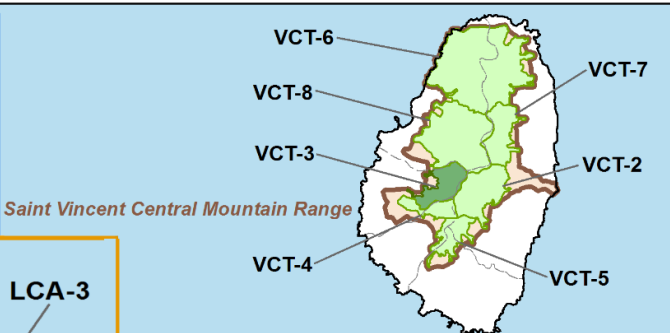
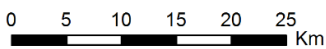






CEPF corridors and priority KBAs in Saint Lucia, and St. Vincent and the Grenadines

Priority KBAs
 KBAs



Annex 2: Roles and Responsibilities of the Implementing Agencies

Overall responsibility for identification of environmental and social risks and impacts, and for design and effective implementation of mitigation measures lies with the CEPF Secretariat. In this role, it is supported by the RIT.

The RIT has principal responsibility for oversight of small grantees' compliance with the ESSs. It will be supported in this role by the CEPF Secretariat, which will provide tools, training and mentoring, focusing on capacity needs. Within the RIT, the responsibilities of different positions in relation to oversight of compliance with the World Bank ESSs in the following table:

Position	Responsibilities
Executive Director	Responding to grievances submitted via the CI Ethics Hotline; communication of grievances to the CEPF Secretariat.
Programmes Director	Oversight of the RIT in regard to supervision of small grantees' compliance with the World Bank ESSs.
Team Leader	Final review of all applications for small grants to CSOs, prior to contracting; verification that mitigation measures meet the requirements of the World Bank ESSs; disclosure of environmental and social instruments related to the project on the CEPF-Caribbean webpage on CANARI's website.
Capacity Building Officer	Design of training for sub-grantees (to be delivered in coordination with the relevant Country Coordinator) to address capacity needs identified during project preparation in relation to the World Bank ESSs.
Country Coordinator – Dominican Republic	Support to applicants for sub-grants in the Dominican Republic with identifying which ESSs would apply; provision of guidance and hands-on support to small grantees in the Dominican Republic to design mitigation measures that meet the requirements of the applicable ESSs; monitoring compliance of Dominican Republic small grantees with ESS requirements; reporting on Dominican Republic small grantee ESS compliance to the RIT Team Leader; support to the CEPF Grant Director with monitoring large grantee compliance with ESS requirements including through conducting project site visits in the Dominican Republic.
Country Coordinator – Haiti	Support to applicants for sub-grants in Haiti with identifying which ESSs would apply; provision of guidance and hands-on support to small grantees in Haiti to design mitigation measures that meet the requirements of the applicable ESSs; monitoring compliance of Haitian small grantees with ESS requirements; reporting on Haitian small grantee ESS compliance to the RIT Team Leader; support to the CEPF Grant Director with monitoring large grantee compliance with ESS requirements including through conducting project site visits in Haiti.
Country Coordinator - English-speaking Caribbean (Antigua and Barbuda, Jamaica The	Support to applicants for sub-grants in English-speaking Caribbean countries with identifying which ESSs would apply; provision of guidance and hands-on support to small grantees in the English-speaking Caribbean to design mitigation measures that meet the requirements of the applicable ESSs; monitoring compliance of small

Position	Responsibilities
Bahamas, St. Lucia, St. Vincent and the Grenadines)	grantees in the English-speaking Caribbean with ESS requirements; reporting on English-speaking Caribbean small grantee ESS compliance to the RIT Team Leader; support the CEPF Grant Director with monitoring large grantee compliance with ESS requirements including through conducting project site visits in the English-speaking Caribbean.
Small Grants Manager	Screening of small grant LOIs to determine which ESSs apply; monitoring of compliance of small grantees with ESS requirements.

The CEPF Secretariat has principal responsibility for oversight of other grants, including large grants to CSOs, as well as the CSAT and RIT grants. If and when issues arise with large grants, the CEPF Secretariat may call on the RIT for assistance, for instance to undertake rapid fact-finding missions to the sub-project site or to interview complainants or other stakeholders. Within the CEPF Secretariat, the responsibilities of different positions are set out in the following table:

Position	Responsibilities
Executive Director	Responding to grievances submitted via the CI Ethics Hotline; communication of grievances to World Bank
Managing Director	Final review of all applications for large grants to CSOs, as well as RIT and CSAT grants, prior to contracting; verification that mitigation measures meet the requirements of the World Bank ESSs
Grant Director	Screening of large grant LOIs to determine which ESSs apply; provision of guidance and, where needed, hands-on support to sub-grantees to design mitigation measures that meet the requirements of the applicable ESSs; monitoring of compliance of large grantees with ESS requirements; oversight of RIT in regard to supervision of small grantees' compliance with ESS1, 3, 4, 6, 8 and 10; provision of training, guidance and hands-on support to RIT
Grants Manager	Approval of large grantees' Labor Management Procedures; supervision of large grantees' compliance with ESS2; oversight of RIT in regard to supervision of small grantees' compliance with ESS2
Senior Director, Monitoring, Evaluation and Outreach	Design and delivery of training for RIT to address capacity needs identified during project preparation; development of online guidance and training materials for sub-grantees in relation to the World Bank ESSs
Communications Manager	Disclosure of environmental and social instruments related to the project on the CEPF website

Annex 3: National Regulatory Framework

This annex must read together with Table 3 under Section 2.2 National Policies and Legal Framework, which contains Aspects of the standard relevant to the project, Gaps in regard to standard, and Measures taken/to be taken.

ESS2: Labor and Working Conditions

With regard to ESS2, the CEPF Secretariat is located at the offices of CI in Virginia, USA. US Federal and Virginia State labor laws are applicable to the staff employed by CI to work for the CEPF Secretariat. Key laws and their relevance to ESS2 are presented in the following table.

Federal/State	Law	Relevance to ESS2
Federal	Fair Labor Standards Act (1938)	Establishes minimum wage, overtime pay, recordkeeping, and youth employment standards affecting employees in the private sector.
Federal	Title VII of the Civil Rights Act (1964)	Prohibits harassment and discrimination in the workplace based on race, color, religion, sex and national origin.
Federal	Occupational Safety and Health Act (1970)	Mandates that all non-government employers provide a safe and healthful workplace for their employees.
State	Title 16 (Labor and Employment) of the Virginia Administrative Code (1992)	Establishes state labor standards, defines hazardous occupations, and governs the employment of minors.

The RIT will be hosted at the offices of CANARI in Port of Spain, Trinidad and Tobago. Trinidadian labor laws are applicable to the staff employed by CANARI to work for the RIT. Key laws and their relevance to ESS2 are presented in the following table. CANARI will also employ staff or engage consultants to work for the RIT in at least some of seven project countries; relevant legislation in these countries is presented in a later table.

Country	Law	Relevance to ESS2
Trinidad and Tobago	Industrial Relations Act (1972)	Establishes rights to trade union membership, collective bargaining and industrial action.
Trinidad and Tobago	Minimum Wages Act (1976; amended)	Mandates minimum wages and terms and conditions of employment; establishes process for setting minimum wages.
Trinidad and Tobago	Section XIV of the Children Act (2012)	Prohibits the employment of children under the age of 14, places restrictions on employment of young persons under the age of 16, and places obligations on employers of young persons under the age of 18.
Trinidad and Tobago	Maternity Protection Act (1998)	Makes provision for a minimum level of maternity leave benefits and protection.

Trinidad and Tobago	Occupational Safety and Health Act (2004)	Establishes the duties of employers to ensure safety, health and welfare in the workplace for all employees.
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The CSAT will be hosted at the offices of INTEC in Santo Domingo, Dominican Republic, as well as the offices of Integrated Health Outreach in Antigua and Barbuda. Key labor and employment legislation in these countries relevant to ESS2 is presented in the following table.

The majority of the CSOs supported under the project will be local organizations, based in one of the seven project counties: Antigua and Barbuda; The Bahamas; the Dominican Republic; Haiti; Jamaica; Saint Lucia; and Saint Vincent and the Grenadines. Key laws in these countries and their relevance to ESS2 are presented in the following table. CSOs based outside of these countries, such as international non-governmental organizations, will be eligible to apply grants under the project. It is anticipated that a small number will be supported, where they demonstrate a clear competitive advantage or unique capabilities relative to the goals of the project. In such cases, the legal framework governing labor and employment in the jurisdiction(s) where these organizations employ or engage workers will be summarized in the Labor Management Procedures that they will be required to produce under ESS2.

Country	Law	Relevance to ESS2
Antigua and Barbuda	Disabilities and Equal Opportunities Act (2017)	Expounds the principles of equality and non-discrimination in relation to persons with disabilities.
Antigua and Barbuda	The Antigua and Barbuda Labour Code (1975; amended)	Brings together all major legislation applicable to employment standards and industrial relations. Prohibits the employment of children and young persons under the age of 16 years and places restrictions on employment of young persons under the age of 18.
The Bahamas	Persons with Disabilities (Equal Opportunities) Act (2014)	Establishes rights of persons with disabilities.
The Bahamas	Health and Safety at Work Act (2002; amended)	Establishes general duties of employers to their employees regarding health and safety at work.
The Bahamas	Employment Act (2001; amended)	Establishes comprehensive legal framework for employment, including with regards to conditions of employment and employment of children. Specifically, the act prohibits the employment of children under the age of 14 years and places restrictions on employment of young persons under the age of 18.
The Bahamas	Industrial Relations Act (1970; amended)	Provides for the registration and control of trade unions and for the recognition of trade unions by employers.

Country	Law	Relevance to ESS2
Dominican Republic	Resolution Concerning Unsafe and Unhealthy Jobs (1993)	Establishes standards for occupational health and safety.
Dominican Republic	Labor Code of the Dominican Republic (1984)	Provides for regulation of industrial relations and establishes employment standards, including with regard to employment of children. Specifically, the code prohibits the employment of children under the age of 14 years and places restrictions on employment of young persons under the age of 18.
Haiti	Law on Minimum Wage for Industrial and Commercial Establishments (2009)	Establishes the minimum wage for industrial and commercial establishments.
Haiti	Constitution of Haiti (1987)	Establishes the right to a fair wage, rest, paid annual vacation and a bonus, and establishes the minimum age for employment.
Haiti	Legislation on the Elimination of all Forms of Racial Discrimination (1981)	Prohibits any act of discrimination on the grounds of race, color, appearance, nationality or ethnic origin, particularly in the field of employment.
Haiti	Labor Code of Haiti (1961)	Establishes employment standards, including minimum age for employment of children, and minimum health and safety regulations.
Haiti	Law Organizing and Regulating Labor (2017)	Prohibits employment of children and young people under the age of 16.
Jamaica	Disabilities Act (2014)	Provides for employment of and non-discrimination against persons with disabilities.
Jamaica	Trade Unions Act (1919; amended)	Provides legal recognition for trade unions and establishes the right of collective bargaining.
Jamaica	Labour Relations and Industrial Disputes Act (1975; amended)	Regulates relations between employers and workers, including procedures for settlement of industrial disputes.
Jamaica	Minimum Wage Act (1938; amended)	Provides for the protection of workers in relation to the payment of wages.
Jamaica	Employment (Termination and Redundancy Payment) Act (1974)	Provides for a separation payment whenever an employee is made redundant or their employment is terminated.
Jamaica	Holiday with Pay Act (1974)	Establishes the right to paid annual vacation.

Country	Law	Relevance to ESS2
Jamaica	Jamaica (Constitution) Order in Council Act (1962; amended)	Confers protection from discrimination on the grounds of race, etc.
Jamaica	Employment (Equal Pay for Men and Women) Act (1975)	Prohibits discrimination on grounds of sex in respect of remuneration and other terms and conditions of employment.
Jamaica	Maternity Leave Act (1979)	Prevents some forms of discrimination against pregnant women and entitles pregnant women to 12 weeks of maternity leave.
Jamaica	Child Care and Protection Act, (2004)	Prohibits the employment of children under the age of 13, restricts employment of children under the age of 15 to light work, and prohibits the employment of young people under the age of 18 in hazardous work.
Jamaica	Factories Act (1943; amended)	Provides for regulation of occupational health and safety in certain settings, including building operations and engineering construction.
Saint Lucia	Labour Code of Saint Lucia (2006; amended)	Establishes fundamental principles of employment, including with regards to terms and conditions, occupational health and safety, equal opportunities and industrial relations. The code prohibits employment of children and young persons below the minimum school leaving age.
Saint Lucia	Education Act (1999)	Sets the minimum school leaving age at 15.
Saint Lucia	Equality of Opportunity and Treatment in Employment and Occupation Act (2000)	Provides for protection against unlawful discrimination on grounds of race, sex, religion, color, ethnic origin, family responsibilities, pregnancy, marital status, or age, and places restrictions on work and employment of minors.
Saint Lucia	Minimum Wages Act (1999; amended)	Establishes process for setting minimum wages for workers in particular sectors or industries.
Saint Lucia	Employees (Occupational Health and Safety) Act (1985)	Covers all aspects of occupational health and safety, including providing for preventive health measures, protective devices and equipment.
Saint Vincent and the Grenadines	Wages Councils Act (1953)	Provides for the establishment of wages councils and the making of wages regulations addressing <i>inter alia</i> minimum wage, hours of work, overtime, vacation

Country	Law	Relevance to ESS2
		and sick pay, maternity leave and health and safety.
Saint Vincent and the Grenadines	Trade Unions Act (1950)	Provides for the establishment and regulation of trade unions.
Saint Vincent and the Grenadines	Trade Disputes (Arbitration and Inquiry) Act (1940)	Provides for arbitration in industrial disputes.
Saint Vincent and the Grenadines	Protection of Employment Act (2003)	Provides for maintenance of good relationships between employers and employees, and addresses matters of severance and settlement of disputes.
Saint Vincent and the Grenadines	Equal Pay Act (1994)	Prohibits discrimination based on grounds of sex in respect of remuneration and other terms and conditions of employment.
Saint Vincent and the Grenadines	Constitution of Saint Vincent and the Grenadines (1979)	Establishes right of protection from discrimination on grounds of sex, race, place or origin, political opinions, color or creed.
Saint Vincent and the Grenadines	Employment of Women, Young Persons and Children Act (1935)	Establishes the legal age of a child as under 14 and prohibits employment of children in certain settings.
Saint Vincent and the Grenadines	Environmental Health Services Act (1991)	Provides for the regulation of activities that may affect public health and the environment.
Saint Vincent and the Grenadines	Factories Act (1955)	Provides for health, safety, welfare and special protective measures in certain workplace settings.

ESS3: Resource Efficiency and Pollution Prevention and Management

With regard to ESS3, the only activities that this standard is likely to apply to are ones under the CSO sub-projects that will be designed and implemented under Component 1. These activities will be implemented in the seven project countries. Key laws in these countries and their relevance to ESS3 are presented in the following table.

Country	Law	Relevance to ESS3
Antigua and Barbuda	Pesticides and Toxic Chemicals Act (2008)	Regulates the importation, storage, manufacture, sale, transportation, use and disposal of pesticides and toxic chemicals.
Antigua and Barbuda	Environmental Protection and Management Act (2015)	Provides for measures for the control and mitigation of all forms of environmental degradation or pollution including the management of pesticides and other hazardous substances for the purposes of protecting human health and maintaining the quality of the environment.

Country	Law	Relevance to ESS3
The Bahamas	Environmental Health Services Act (1987)	Provides for measures to promote the conservation and maintenance of the environment in the interest of health, including regulation of pest and vector control and use of pesticides.
Dominican Republic	Pesticides Law (1968)	Provides for the regulation of import, manufacture, sale, storage and use of pesticides.
Haiti	None currently in place	Not applicable
Jamaica	Pesticides Act (1987)	Provides for the regulation of import, sale, storage and use of pesticides, and includes lists of prohibited and restricted pesticides.
Saint Lucia	Toxic Chemicals and Pest Control Act (2000)	Regulates the use of pesticides and other toxic chemicals in pest control.
Saint Lucia	Pesticides Control Act (1975)	Provides for the establishment of the Pesticides Control Board and grants powers to inspectors regarding use, sale and storage of pesticides.
Saint Vincent and the Grenadines	Environmental Health Services Act (1991)	Provides for the regulation of activities that may affect public health and the environment.
Saint Vincent and the Grenadines	Pesticides Control Act (1973; amended)	Provides for the establishment of the Pesticides Control Board and grants powers to inspectors regarding use, sale and storage of pesticides.

ESS4: Community Health and Safety

Key laws in the project countries and their relevance to ESS4 are presented in the following table.

Country	Law	Relevance to ESS4
Antigua and Barbuda	Environmental Protection and Management Act (2015)	Provides for measures for the control and mitigation of all forms of environmental degradation or pollution including the management of pesticides and other hazardous substances to protect human health and maintain the quality of the environment.
Antigua and Barbuda	Public Health Act (1957; amended)	Makes provisions for various matters relating to public health, including with regards to notification and control of infectious diseases.
The Bahamas	Disaster Preparedness and Response Act (2006)	Provides for more effective organization of the mitigation of, preparedness for, response to and recovery from emergencies and disasters.

Country	Law	Relevance to ESS4
The Bahamas	Health Services Act (1914; amended)	Provides for regulation of various matters related to the protection of public health, including control of infectious diseases.
Dominican Republic	General Health Law (2001)	Defines the role of the state in relation to fulfilling citizen's rights to health.
Haiti	Organic Law of the Department of Public Health and Population (1971)	Provides for the implementation of various measures to protect public health.
Jamaica	Public Health Act (2003)	Provides a list of communicable diseases that must be notified to the competent authorities.
Jamaica	Disaster Preparedness and Emergency Management Act (1993)	Provides for disaster preparedness and emergency management measures.
Saint Lucia	Public Health (Communicable and Notifiable Diseases) Regulations (1978; amended)	Provides a list of communicable diseases that must be notified to the competent authorities under the Public Health Act.
Saint Lucia	Public Health Act (1975)	Consolidates regulations for public health, including on the prevention, treatment, limitation and suppression of disease.
Saint Vincent and the Grenadines	Environmental Health Services Act (1991)	Provides for the regulation of activities that may affect public health and the environment.
Saint Vincent and the Grenadines	Public Health Act (1977)	Provides for various measures concerned with protecting public health, including control of infectious diseases.

ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Key laws in these countries and their relevance to ESS5 are presented in the following table.

Country	Law	Relevance to ESS5
Antigua and Barbuda	Constitution of Antigua and Barbuda (1981)	Establishes right of protection from deprivation of property, and provides for compulsory acquisition of property for public purposes.
Antigua and Barbuda	National Parks Act (1985)	Provides for establishment of and regulation of activities within protected areas.
The Bahamas	Conservation and Protection of the Physical Landscape of the Bahamas Act (1997)	Provides for establishment of and regulation of activities within protected areas.

Country	Law	Relevance to ESS5
The Bahamas	Fisheries Resources Act (1977)	Provides for the conservation and sustainable management of marine fisheries resources.
Dominican Republic	Constitution of the Dominican Republic (2015)	Establishes right to private property and provides for compulsory acquisition for a justified cause of public utility or of social interest, subject to compensation.
Dominican Republic	Protected Areas Law (2004)	Provides for establishment of and regulation of activities within protected areas.
Haiti	Constitution of Haiti (1987)	Establishes right to private property and the legal process for expropriation.
Haiti	Decree on Naming National Parks, National Sites and Natural Sites (1968)	Provides for the establishment of protected areas.
Jamaica	Fishing Industry (Special Fishery Conservation Area) Regulations (2012)	Provides for designation and setting of management regulations for special fishery conservation areas.
Jamaica	Natural Resources (National Parks) Regulations (1993)	Establishes management regulations for national parks.
Jamaica	Constitution of Jamaica (1962; amended)	Establishes right of protection against compulsory acquisition of property.
Saint Lucia	Fisheries Act (1984)	Provides for the conservation and sustainable management of marine fisheries resources, including the establishment of marine reserves.
Saint Lucia	Constitution of Saint Lucia (1978)	Establishes right of protection from deprivation of property, and provides for compulsory acquisition of property for public purposes.
Saint Vincent and the Grenadines	National Parks Act (2002)	Provides for establishment of and regulation of activities within national parks, and provides for compulsory acquisition of land for establishment of national parks.
Saint Vincent and the Grenadines	Constitution of Saint Vincent and the Grenadines (1979)	Establishes right of protection from deprivation of property, and provides for compulsory acquisition of property for public purposes.

ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

Key laws in these countries and their relevance to ESS6 are presented in the following table.

Country	Law	Relevance to ESS6
Antigua and Barbuda	Environmental Protection and Management Act (2015)	Provides for sustainable environmental protection and management, allocates administrative responsibilities for environment management, and consolidates implementation of the Multilateral Environmental Agreements.
The Bahamas	Wildlife Conservation and Trade Act (2004)	Provides for the protection of wild species from harm through unsustainable exploitation.
The Bahamas	Conservation and Protection of the Physical Landscape of the Bahamas Act (1997)	Makes provision for the conservation and protection of the physical landscape.
Dominican Republic	General Law on Environment and Natural Resources (2000)	Establishes norms for conservation, protection, rehabilitation, restoration and sustainable use of the environment and natural resources.
Haiti	Rural Code (1962)	Provides for regulation of exploitation of forest resources.
Jamaica	Forest Regulations (2001)	Establishes rights and processes for management and sustainable use of forests and forest resources.
Jamaica	Endangered Species Act (2000)	Provides for protection, conservation and regulation of trade in endangered species.
Saint Lucia	Wildlife Protection Act (1980)	Provides for regulation of the harvesting of wild animals.
Saint Lucia	Forest, Soil and Water Conservation Act (1946, amended)	Provides for regulation of the exploitation of forest resources.
Saint Vincent and the Grenadines	Forest Resources Conservation Act (1992)	Provides for regulation of the exploitation of forest resources.
Saint Vincent and the Grenadines	Wildlife Protection Act (1987, amended)	Provides for regulation of the harvesting of wild animals.

ESS8: Cultural Heritage

Key laws in these countries and their relevance to ESS8 are presented in the following table.

Country	Law	Relevance to ESS8
Antigua and Barbuda	National Parks (amendment) Act (2004)	Provides for preservation, protection, management and development of architectural, cultural and historical heritage.
The Bahamas	Antiquities, Monuments and Museum Act (1998)	Provides for preservation of natural cultural heritage and establishes procedures for designating monuments.
Dominican Republic	Constitution of the Dominican Republic (2015)	Provides for the protection, conservation and restoration of national cultural heritage.
Haiti	Constitution of Haiti (1987)	Places monuments, ruins, battlefields, famous centers of African beliefs, and all vestiges of the past under the protection of the state.
Haiti	Decree on Naming National Parks, National Sites and Natural Sites (1968)	Provides for the establishment of protected areas in areas of national significance for historical or natural values.
Jamaica	Jamaica National Heritage Trust Act (1985)	Establishes procedures to declare and protect national monuments and protected national heritage.
Saint Lucia	Saint Lucia National Trust Act (1975)	Establishes the Saint Lucia National Trust and empowers it to obtain properties of prehistoric, historic, archaeological, architectural, artistic or traditional interest for the benefit of the state.
Saint Vincent and the Grenadines	Saint Vincent and the Grenadines National Trust Act (1969)	Provides for preservation of natural, historic, cultural and built heritage.

Annex 4: Eligibility Criteria for Sub-grants Awarded under the Project

The Critical Ecosystem Partnership Fund (CEPF) grant decision-making process is based on the evaluation of proposals in accordance with the objectives and strategies of the Fund and the relevant ecosystem profile.

Proposals that target direct global environmental benefits and meet the following eligibility criteria are welcome:

- Project is located in the Caribbean Islands Hotspot.
- Project is located in a country that is not excluded by U.S. law.
- Project supports a strategic direction outlined in the Caribbean Islands Hotspot ecosystem profile and investment strategy.
- Grant applicant is authorized under relevant national laws to receive charitable contributions.
- Government-owned enterprises or institutions are eligible only if they can establish i) that the enterprise or institution has a legal personality independent of any government agency or actor, ii) that the enterprise or institution has the authority to apply for and receive private funds, and iii) that the enterprise or institution may not assert a claim of sovereign immunity.
- Grant will not be used for activities involving child labor or forced labor.
- Grant will not be used for the purchase of land, physical resettlement of people, or activities that have potential to cause adverse impacts to critical habitat.
- Grant will not be used for activities involving the use of formulated pesticide products that meet the criteria of carcinogenicity, mutagenicity, or reproductive toxicity as set forth by relevant international agencies
- Grant will not be used to fund salaries or salary supplements of government security personnel, or to purchase of firearms or other weapons.
- Proposed activities observe all other relevant environmental and social standards.
- CEPF will not award grants for \$2 million and above, without special approval from the Project Steering Committee.

In addition, CEPF encourages proposals that demonstrate the following characteristics, as relevant:

- Existence of co-financing or the ability to leverage additional funds.
- Demonstration of coordination with other organizations to reduce duplication of efforts.
- Existence of partnerships or alliances with one or more other organizations.
- Endorsements from other recognized agencies or authorities.
- Transnational or regional projects.
- Clear plans for continuation and/or replication after initial CEPF funding.
- Support to Indigenous and local communities in community-based or co-management activities for biodiversity conservation and actions that enhance local communities' tenure and resource use rights.

Annex 5: Negative List of Activities that Will not be Funded by the Project

- The use of child or forced labor.
- Purchase and use of formulated projects that fall in the World Health Organization classes IA and IB or formulations of products in class II if they are likely to be used by, or be accessible to, lay personnel, farmers or others without training, equipment and facilities to handle, store and apply these products properly.
- Financing of elections or election campaigning.
- Funding salaries or salary supplements of government security personnel.
- Purchase of firearms or other weapons.
- Activities that contravene local laws related to purchase and consumption of tobacco, alcoholic beverages and other drugs.
- Manufacture of alcohol for local consumption and/or cultivation of crops for this purpose.
- Activities carried out in relation to the adjudication of lands under dispute.
- Physical resettlement of people (voluntary or involuntary).
- Purchase of land.
- Activities that have potential to causes adverse impacts to critical habitat.
- Conversion, deforestation or degradation of natural forests or other natural habitats, including, among others, conversion to agriculture or tree plantations.
- Activities related to commercialization of illegal timber and non-timber forest products.
- Construction and/or restoration of religious buildings.
- Removal or alteration of any physical cultural heritage property (includes sites having archeological, paleontological, historical, religious or unique natural values).

Annex 6: Environmental and Social Impact Assessment and Management Plan Template



**Environmental and Social Impact Assessment
and
Environmental and Social Management Plan**

Date

CEPF Grant xxxxx

Grantee

Sub-project Title

Sub-project Location

The objectives the Environmental and Social Impact Assessment are to:

- Establish the baseline conditions of the study area through a combination of desk review, consultations and site visits taking account of any committed development projects that could change the baseline in the future.
- Identify environmental constraints and opportunities associated with the study area.
- Identify and assess any environmental impacts (both positive and negative) that could result from the proposed sub-project.
- Identify and incorporate into sub-project design and operation, features, and measures to avoid or mitigate adverse impacts and enhance beneficial impacts.
- Assess the level of significance of all residual effects (direct and indirect, adverse and beneficial, short-term and long-term, permanent and temporary) taking into account of the proposed mitigation measures.

The ESIA should encompass the following:

Grant Summary

1. Grantee organization.
2. Grant title.
3. Grant number.
4. Grant amount (US dollars).
5. Proposed dates of grant.
6. Countries or territories where sub-project will be undertaken.
7. Summary of the sub-project.
8. Date of preparation of this document.
9. **Legal and regulatory framework**: This section will analyze the legal and institutional framework for the sub-project, within which the environmental and social assessment is carried out, including the issues set out in the World Bank ESS1, paragraph 26⁷.
10. **Status of area to be impacted**: This section will describe the applicant's understanding of the site, including a concise description of the proposed sub-project's geographic, environmental, social, and temporal context. Where possible, it should include a map of sufficient detail, showing the sub-project site and the area that may be affected by the sub-project's direct and indirect impacts.
11. **Approach**: This section will describe proposed actions during the sub-project. Specifically, what do you intend to do and how will you do it?
12. **Baseline data**: This section will identify baseline data that are relevant for decisions about sub-project location, design, operation, or mitigation measures. Based on current information, it should assess

⁷ Paragraph 26 of ESS1 states that the environmental and social assessment will take into account "in an appropriate manner all issues relevant to the project, including: (a) the country's applicable policy framework, national laws and regulations, and institutional capabilities (including implementation) relating to environment and social issues; variations in country conditions and project context; country environmental or social studies; national environmental or social action plans; and obligations of the country directly applicable to the project under relevant international treaties and agreements; (b) applicable requirements under the ESSs; and (c) the Environmental Health and Safety Guidelines, and other relevant Good International Industry Practice."

the scope of the area to be studied and describe relevant physical, biological, and socioeconomic conditions, including any changes anticipated before the sub-project commences.

13. **Anticipated impacts and risks:** This section will describe the impact and how this impact has been determined. It should include positive and negative environmental and social outcomes.
14. **Mitigation measures:** This section will describe measures that will be taken to mitigate negative impacts. It should identify and summarize all anticipated adverse environmental and social impacts and describe with technical detail 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). It should also estimate any potential environmental and social impacts of these measures. Differentiated measures should be identified so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable.
15. **Actions to ensure health and safety:** This section will describe actions that will be taken to ensure the health and safety of workers, as well as the site. It should include a description of waste management and/or disposal, where relevant.
16. **Monitoring and evaluation:** This section will outline the steps the applicant will take to monitor and evaluate the impact of the proposed intervention. It should identify the monitoring objectives and specify the type of monitoring, with linkages to the impacts assessed and the mitigation measures described. This is meant to provide (a) 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; and (b) monitoring and reporting procedures to (i) ensure early detection of conditions that necessitate particular mitigation measures, and (ii) furnish information on the progress and results of mitigation.
17. **Implementation schedule and cost estimates:** For the mitigation and monitoring measures in sections 14 and 16, this section will provide: (a) an implementation schedule for measures that must be carried out as part of the sub-project, showing phasing and coordination with overall sub-project implementation plans; and (b) the capital and recurrent cost estimates and sources of funds for implementing the ESMP should be included.
18. **Permission of the landowner:** Please verify permission of the landowner to undertake actions on the site, and verify that you have the required permits to undertake this work.
19. **Consultation:** This section aims to outline the range of informed consultations that the applicant has had both with experts to optimize the potential for success, and with stakeholders, particularly local communities, who are potentially affected by the proposed actions. It should include dates of consultations.
20. **Disclosure:** CEPF requires that the environmental and social documents are disclosed to affected local communities and stakeholders prior to sub-project implementation. Please describe efforts to disclose this impact assessment and environmental management plan and provide dates.

Annex 7: Pest Management Procedures

Integrated Pest Management (IPM) and Integrated Vector Management (IVM) are encouraged when a sub-project engages pest management measures. IPM refers to a mix of farmer-driven, ecologically based pest control practices that seeks to reduce reliance on synthetic chemical pesticides. It involves: (a) managing pests (keeping them below economically damaging levels) rather than seeking to eradicate them; (b) integrating multiple methods (relying, to the extent possible, on nonchemical measures) to keep pest populations low; and (c) selecting and applying pesticides, when they have to be used, in a way that minimizes adverse effects on beneficial organisms, humans and the environment. IVM is a process for the optimal use of resources for vector control. The approach seeks to improve the efficacy, cost-effectiveness, ecological soundness and sustainability of disease-vector control.

IPM is the use of multiple techniques to prevent or suppress pests in a given situation. Although IPM emphasizes the use of nonchemical strategies (e.g. mechanical and physical control, biological control), chemical control may be an option used in conjunction with other methods. IPM strategies depend on surveillance to establish the need for control and to monitor the effectiveness of management efforts. Preference should be given to alternative pest management strategies, with the use of synthetic chemical pesticides as a last option. Those who make pest management decisions should be provided with training in identification of pests and beneficial (e.g. natural enemy) species, identification of weeds, and field scouting methods to evaluate which pests are present and whether they have reached an economic control threshold (the density at which they begin to cause economically significant losses).

Alternatives to Pesticide Application

Where feasible, the following alternatives to pesticides should be considered:

- Rotate crops to reduce the presence of pests and weeds in the soil ecosystem.
- Use pest-resistant crop varieties.
- Use mechanical weed control and/or thermal weeding.
- Support and use beneficial organisms, such as insects, birds, mites, and microbial agents, to perform biological control of pests.
- Protect natural enemies of pests by providing a favorable habitat, such as bushes for nesting sites and other original vegetation that can house pest predators and by avoiding the use of broad-spectrum pesticides.
- Use animals to graze areas and manage plant coverage
- Use mechanical controls such as manual removal, traps, barriers, light, and sound to kill, relocate, or repel pests.

Pesticide Application

If pesticide application is warranted, users are recommended take the following actions:

- Train personnel to apply pesticides and ensure that personnel have received applicable certifications or equivalent training where such certifications are not required.
- Review and follow the manufacturer's directions on maximum recommended dosage or treatment as well as published reports on using the reduced rate of pesticide application without loss of effect and apply the minimum effective dose.
- Avoid routine calendar-based application and apply pesticides only when needed and useful based on criteria, such as field observations and weather data (e.g. appropriate temperature, low wind, etc.).

- Avoid the use of highly hazardous pesticides, particularly by uncertified, untrained or inadequately equipped users. This includes:
 - Pesticides that fall under the World Health Organization Recommended Classification of Pesticides by Hazard Classes 1a and 1b.
 - Pesticides that fall under the World Health Organization Recommended Classification of Pesticides by Hazard Class II should be avoided if the sub-project host country lacks restrictions on distribution and use of these chemicals, or if they are likely to be accessible to personnel without proper training, equipment, and facilities to handle, store, apply, and dispose of these products properly.
 - Avoid the use of pesticides listed in Annexes A and B of the Stockholm Convention, except under the conditions noted in the convention and those subject to international bans or phaseouts.
 - Pesticides that contain active ingredients that are restricted under applicable international conventions or their protocols or that are listed in, or meeting, the criteria of their annexes, unless for an acceptable purpose as defined by such conventions, their protocols or annexes.
 - Pesticide products that meet the criteria of carcinogenicity, mutagenicity, or reproductive toxicity as set forth by relevant international agencies.
- Use only pesticides that are manufactured under license and registered and approved by the appropriate authority and in accordance with the Food and Agricultural Organizations (FAO) International Code of Conduct on the Distribution and Use of Pesticides.
- Use only pesticides that are labeled in accordance with international standards and norms.
- Select application technologies and practices designed to reduce unintentional drift or runoff only as indicated in an IPM program, and under controlled conditions.
- Maintain and calibrate pesticide application equipment in accordance with manufactures recommendations.
- Use application equipment that is registered in the country of use.
- Establish untreated buffer zones or strips along water sources, rivers, streams, ponds, lakes, and ditches to help protect water resources.
- Avoid use of pesticides that have been linked to localized environmental problems and threats.

The pesticides should: (a) have negligible adverse human health effects; (b) be shown to be effective against the target species; and (c) have minimal effect on nontarget species and the natural environment.

Pesticide Handling and Storage

Contamination of soils, groundwater, or surface water resources, due to accidental spills during transfer, mixing, and storage of pesticides should be prevented by following the hazardous materials storage and handling recommendations. These include:

- Pesticides should be stored in their original packaging, in a dedicated, dry, cool, frost-free, and well aerated location that can be locked and properly identified with signs, with access limited to authorized people.
- No human or animal food may be stored in this location. The storeroom should also be designed with spill containment measures and sited in consideration of potential for contamination of soil and water resources.
- Mixing and transfer of pesticides should be undertaken by trained personnel in ventilated and well-lit areas, using containers designed and dedicated for this purpose.

- Containers should not be used for any other purpose (e.g. drinking water). Contaminated containers should be handled as hazardous waste and should be disposed in specially designated for hazardous wastes sites. Ideally, disposal of containers contaminated with pesticides should be done in a manner consistent with FAO guidelines and with manufacturer's directions.
- Purchase and store no more pesticide than needed and rotate stock using a “first-in, first out” principle so that pesticides do not become obsolete. Additionally, the use of obsolete pesticides should be avoided under all circumstances. A management plan that includes measures for the containment, storage and ultimate destruction of all obsolete stocks should be prepared in accordance to guidelines by FAO and consistent with country commitments under the Stockholm, Rotterdam and Basel Conventions.
- Collect rinse water from equipment cleaning for reuse (such as for the dilution of identical pesticides to concentrations used for application); ensure that protective clothing worn during pesticide application is either cleaned or disposed of in an environmentally responsible manner; maintain records of pesticide use and effectiveness.

Pest Management Plan (PMP)

When there are significant pest management issues identified, a Pest Management Plan (PMP) will need to be prepared. A PMP is also prepared when pest control products represent a large component of the sub-project. The PMP is a comprehensive framework through which pest management is defined and accomplished. The PMP should identify elements of the program to include health and environmental safety, pest identification, and pest management, as well as pesticide storage, transportation, use and disposal. The PMP is to be used as a tool to reduce reliance on pesticides, to enhance environmental protection, and to maximize the use of integrated pest management techniques. The PMP should apply to all the activities and individuals working on the sub-project or activity. The PMP should be consistent with IPM and emphasize that non-chemical control efforts will be used to the maximum extent possible before pesticides are used. The outline of a PMP is provided below:

Grant Summary

1. Grantee organization.
2. Grant title.
3. Grant number.
4. Grant amount (US dollars).
5. Proposed dates of grant.
6. Countries or territories where sub-project will be undertaken.
7. Summary of the sub-project.
8. Date of preparation of this document.

Pest Management Approach: This section should describe your understanding of the problem, your experience with pest management issues, and your proposed actions during the sub-project. Specifically, what do you intend to do and how will you do it? The information presented should include methods of application, e.g. by hand or via aerial spraying.

9. Current and anticipated pest problems relevant to the sub-project.
10. Current and proposed pest management practices.
11. Relevant integrated pest management experience within the sub-project area, country or region.

12. Assessment of proposed or current pest management approach and recommendations for adjustment where necessary.

Pesticide Selection and Use: This section should provide a comprehensive understanding of the pesticide that will be selected, why it was selected and what efforts were made to assess risks to human health. Note that this section should also present information on the potential impacts that the selected pesticide(s) will have on natural ecosystems and non-target species.

13. Description of present, proposed and/or envisaged pesticide use and assessment of whether such use is in line with international good practice.
14. Indication of the type and quantity of pesticides to be financed by the CEPF grant (in volume and dollar value) and/or assessment of increase in pesticide use resulting from the sub-project.
15. Chemical, trade and common names of pesticide(s) to be used.
16. Form(s) in which pesticide(s) will be used (e.g., pellet, block, spray).
17. Specific geographic description of where the pesticide(s) will be applied: province, district, municipality, landowners [do not give names of individual persons], and map coordinates (if available); and the total area (hectares) to which the pesticide(s) will be applied.
18. Assessment of environmental, occupational and public health risks associated with the transport, storage, handling and use of the proposed products under local circumstances, and the disposal of empty containers.
19. Description of plans and results for tracking of damage to natural ecosystems and/or harm to non-target species prior to pesticide application and subsequent to pesticide application.
20. Prerequisites and/or measures required to reduce specific risks associated with envisaged pesticide use under the sub-project (e.g., protective gear, training, upgrading of storage facilities, etc.).
21. Basis of selection of pesticide(s) authorized for procurement under the sub-project, taking into consideration the World Bank Group's Environmental, Health, and Safety Guidelines⁸ and the World Health Organization's Recommended Classification of Pesticides by Hazard⁹, the risks identified under Section 19, and the availability of newer and less hazardous products and techniques (e.g. bio-pesticides, traps).
22. Name and address of source of selected pesticides [do not give names of individual persons].
23. Name and address of vendor of selected pesticides [do not give names of individual persons].
24. Name and address of facility where pesticides will be stored.

Policy and regulatory framework, and institutional capacity: This section should describe the institutional and legal framework under which the pesticide(s) will be applied, with reference to the documentation and standards required under local and national law and international good practice. Where a particular pesticide is not regulated at the target site, you must identify similar pesticides and the applicable regulation in neighboring countries that could apply, and international good practice. You must also explain why this particular pesticide is necessary, even in the absence of national laws.

25. Policies on plant/animal protection, integrated pest management, and humane treatment of animals.

⁸ <https://www.ifc.org/wps/wcm/connect/29f5137d-6e17-4660-b1f9-02bf561935e5/Final%2B-%2BGeneral%2BEHS%2BGuidelines.pdf?MOD=AJPERES&CVID=jOWim3p>

⁹ https://www.who.int/ipcs/publications/pesticides_hazard/en/

26. Description and assessment of national capacity to develop and implement ecologically based invasive alien species control.
27. Description and assessment of the country's regulatory framework and institutional capacity for control of the distribution and use of pesticides.
28. Proposed sub-project activities to train personnel and strengthen capacity [list # of people and what they are being trained in].
29. Confirmation that the appropriate authorities were approached and that the appropriate licenses and permissions were obtained by the sub-project.

Consultation: This section aims to outline the range of informed consultations that you have had both with experts to optimize the potential for success, and with stakeholders, particularly local communities, who are potentially affected by the use of pesticides (due to, for instance, proximity, use of certain areas for free-ranging livestock or non-timber forest product collection, etc.).

30. Dates, and results of expert consultations, if necessary.
31. Dates, and results of consultations with local communities.

Monitoring and evaluation: This section aims to outline the steps you will take to monitor and evaluate the purchase, storage, application and effects of the pesticide(s) in the target area.

32. Description of activities related to pest management that require monitoring during implementation.
33. Monitoring and supervision plan, implementation responsibilities, required expertise and cost coverage.
34. **Disclosure:** CEPF requires that environmental and social instruments are disclosed to affected local communities and other stakeholders prior to sub-project implementation. Please describe the efforts you have taken to disclose this plan.

Annex 8: Chance Find Procedures

Purpose

During sub-project implementation/construction, there is the possibility that previously unknown cultural heritage items may be discovered. This Chance Find Procedure is intended to manage impacts to unknown cultural heritage items. The procedure should be implemented in collaboration with the relevant national authority responsible for cultural heritage. It is important that all sub-project staff and contractors be aware of the potential to discover chance finds and the procedures outlined here. Prior to start of the sub-project, the relevant contact person at the national authority responsible for cultural heritage will be identified.

Objectives

The objectives of the Chance Find procedure are to:

- Define the steps that must be followed to manage the discovery of previously unknown cultural heritage, including the preservation and appropriate treatment of these finds, while also minimizing the potential disruption to the sub-project schedule.
- Enable compliance with relevant national laws and regulations along with other requirements that relate to the discovery of heritage items.

Scope

This procedure is applicable to all activities conducted by sub-project personnel that have the potential to uncover surface or subsurface items of cultural significance that were previously unknown. The procedure does not include already known and documented items.

Steps

If a chance find is discovered the following steps should be undertaken:

1. Issue a STOP WORK order in the vicinity of the find.
2. Inform the Project Manager.
3. Inform the RIT (in the case of CEPF small grants) or the CEPF Secretariat (in the case of large grants).
4. Install temporary site protection measures, such as warning tape of avoidance signs, to establish a restricted area around the Chance Find.
5. The Project Manager will record details (location and description) of the find and inform the local/national archeological department.
6. Inform sub-project personnel about the Chance Find and restricted area.
7. Invite the identified contact person at the national authority responsible for cultural heritage to document the Chance Find, perform a preliminary evaluation to determine whether the Chance Find is cultural heritage and if so, whether it is an isolate or part of a larger site or feature.
8. Artefacts should be left in place if possible; if materials are collected, they will be placed in bags and labelled by an archaeologist and transported to the relevant agency. **Artefacts are not allowed to be taken by any sub-project personnel as personal possessions.**

9. The find should be documented via the use of photography, notes, GPS coordinates and maps, as appropriate.
10. If the Chance Find proves to be an isolated find or not of cultural heritage, the archeologist will authorize the removal of the site protection measures and the resumption of activity in the area.
11. If, however, the archeologist confirms the Chance Find as a cultural heritage of significance, the relevant national authority will be informed within three days of that determination and initiate discussions about treatment.
12. Prepare and retain archaeological monitoring records, including initial reports, whether they are later confirmed or not. The record shall include coordinates of all observations to be retained by the sub-project.
13. Develop and implement treatment plans for confirmed finds using the services of qualified cultural heritage experts.
14. If a Chance Find is a verified cultural heritage site, a final Chance Find report shall be prepared once treatment has been completed.
15. While investigation is on-going, there will be coordination with sub-project personnel aimed at keeping them informed about the status of and schedule of the investigations into the chance find. Sub-project personnel will also be informed as timing of the resumption of sub-project activities in the vicinity of the find.

Details of all Chance Finds should be included in the reports submitted to CEPF.

Annex 9: Cultural Heritage Management



Cultural Heritage Plan

Date

CEPF Grant xxxxx

Grantee

Sub-project Title

Sub-project Location

Grant Summary

1. Grantee organization.
2. Sub-project title.
3. Grant number.
4. Grant amount (US dollars).
5. Proposed dates of grant.
6. Countries where activities will be undertaken.
7. Date of preparation of this document.

8. **Status of area to be impacted:** This section will describe the legal designation of the site(s) where sub-project will be implemented.

9. **Cultural heritage present:** This section will describe the elements of tangible and intangible cultural heritage present at the sub-project site(s), including a list of any legally protected cultural heritage areas.

10. **Project components:** This section will briefly describe the sub-project, focusing on those components and activities that may involve impacts on cultural heritage.

11. **Potential risks and impacts:** This section will describe the potential risks and impacts of the proposed activities of the sub-project on cultural heritage.

12. **Measures to preserve cultural heritage:** This section will describe measures that will be taken to avoid adverse impacts or mitigate them, if avoidance is not possible. For sub-projects that explicitly aim to promote or preserve cultural heritage, this section will present a strategy for doing so.

13. **Timeline and resources:** This section will present and implementation timeline for each measure listed in Section 12, together with an estimate of resource needs.

14. **Monitoring and arrangements:** This section aims to outline what steps you will take to monitor and evaluate the effectiveness of the measures listed in Section 12.

15. **Consultation:** This section will summarize the consultations carried out with stakeholders in preparation of the plan, particularly any local communities who may be particularly affected by the proposed activities. Include dates of consultations, and a summary of the number of women and men consulted, but do not include names of individuals.

16. **Disclosure:** CEPF requires that environmental and social instruments are disclosed to affected local communities and other stakeholders prior to sub-project implementation. Please describe the efforts you have taken to disclose this Cultural Heritage Plan.

17. **Chance find procedure:** A chance find procedure is a sub-project-specific procedure which will be followed if previously unknown cultural heritage is encountered during sub-project activities. It will

be included in all contracts relating to construction of the sub-project, including excavations, demolition, movement of earth, flooding or other changes in the physical environment.

The chance find procedure will set out how chance finds associated with the sub-project will be managed, and include requirements to:

- Notify relevant authorities of found objects or sites by cultural heritage experts.
- Fence-off the area of finds or sites to avoid further disturbance.
- Conduct an assessment of found objects or sites by cultural heritage experts.
- Identify and implement actions consistent with the requirements of this ESS and national law.
- Train sub-project personnel and sub-project workers on chance find procedures.

Annex 10: Labor Management Procedures Template



Labor Management Procedures

Date

CEPF Grant xxxxx

Grantee

Sub-project Title

Sub-project Location

Grant Summary

1. Grantee organization.
2. Sub-project title.
3. Grant number.
4. Grant amount (US dollars).
5. Proposed dates of grant.
6. Countries where activities will be undertaken.
7. Date of preparation of this document.

8. **Overview of labor use on the sub-project:** This section should describe the main types of workers who will be employed or engaged on the sub-project, as follows:

Number of Project Workers: The total number of workers to be employed on the sub-project, and the different types of workers: direct workers; contracted workers; and community workers. Where numbers are not yet firm, an estimate should be provided.

Characteristics of Project Workers: To the extent possible, a broad description and an indication of the likely characteristics of the project workers e.g. local workers, national or international migrants, female workers, workers between the minimum age and 18, etc.

Timing of Labor Requirements: The timing and sequencing of labor requirements in terms of numbers, locations, types of jobs and skills required.

Contracted Workers: The anticipated or known contracting structure for the sub-project, with numbers and types of contractors/subcontractors and the likely number of project workers to be employed or engaged by each contractor/subcontractor.

9. **Assessment of key potential labor risks:** This section should identify key potential labor risks related to the sub-project, assess each risk against criteria of probability and severity, and describe in detail all risks rated as moderate, substantial or high. Risk may include, for example:

- The conduct of hazardous work, such as working at heights or in confined spaces, use of heavy machinery, or use of hazardous materials.
- Likely incidents of child labor or forced labor, with reference to the sector or locality.
- Likely presence of migrants or seasonal workers.
- Risks of labor influx or gender-based violence.
- Possible accidents or emergencies, with reference to the sector or locality.
- General understanding and implementation of occupational health and safety requirements.

10. **Risk mitigation measures:** This section will describe the measures that will be taken to mitigate all risks rated as moderate or above. Mitigation measures will be presented following the mitigation hierarchy, which requires that risks are anticipated and avoided where possible. Where avoidance is not possible, risks should be minimized to acceptable levels. Any risks that remain following avoidance and minimization should be mitigated.

11. **Brief overview of legislation: terms and conditions:** This section should present a brief overview of the *key aspects* of national labor and employment law relevant to terms and conditions of employment (e.g., wages, deductions, benefits, etc.).
12. **Brief overview of legislation: occupational health and safety:** This section should present a brief overview of the *key aspects* of national labor and employment law relevant to occupational health and safety.
13. **Responsible staff:** This section identifies the functions and/or individuals within the sub-project responsible for (as relevant):
 - Engagement and management of project workers.
 - Engagement and management of contractors/subcontractors.
 - Occupational health and safety.
 - Training of workers.
 - Addressing worker grievances.
14. **Policies and procedures:** This section should describe policies and procedures for managing each category of sub-project staff, in accordance with national labor and employment law and ESS2.
15. **Contracted workers:** This section will describe how the requirements of national labor and employment law and ESS2 will be incorporated into grant agreements and/or service contracts with third parties who will employ or engage contracted workers.
16. **Community workers:** This section will describe how the requirements of ESS2 will be complied with in regard to community workers employed or engaged to work on the sub-project.
17. **Grievance mechanism:** This section will describe how a mechanism will be provided for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns. The mechanism must: be made easily accessible to such workers; address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned in a language they understand, without any retribution; and operate in an independent and objective manner. Please describe how you will put in place a grievance mechanism that meets these requirements.
18. **Addressing Gender Based Violence:** You will also need to make special provisions for grievances related to gender-based violence (GBV), due to the need for complaints to be handled by persons with specialist training and adopting a survivor-centered approach. You will be provided with the contact details of a GBV service provider in the sub-project country, and will be required to include them in your grievance mechanisms. Survivors of GBV will have the option of contacting the GBV service provider directly, who will, in-turn, inform the CEPF Secretariat, with the express consent of the survivor.

19. **Disclosure:** CEPF requires that all direct and contracted workers be informed of the existence of the grievance mechanism and the measures put in place to protect them against any reprisal for its use, either at the time of recruitment or at the start of the sub-project, whichever is later. CEPF also requires that all direct, contracted and community workers be provided with Conservation International's (CI's) Code of Ethics, and be informed that any violations of the Code of Ethics should be reported to CI via its Ethics Hotline at www.ci.ethicspoint.com

Annex 11: Health and Safety Plan Template



Community Health and Safety Plan

Date

CEPF Grant xxxxx

Grantee

Sub-project Title

Sub-project Location

Grant Summary

1. Grantee organization.
2. Sub-project title.
3. Grant number.
4. Grant amount (US dollars).
5. Proposed dates of grant.
6. Countries where activities will be undertaken.
7. Date of preparation of this document.

8. **Project components**: This section will briefly describe the sub-project, focusing on those components and activities that may involve risks to the health and safety of communities at the sub-project site(s).

9. **Risks to community health and safety**: This section will assess the risk of each activity, against criteria of probability and severity, and describe in detail all risks rated as moderate, substantial or high.

10. **Risk mitigation measures**: This section will describe the measures that will be taken to mitigate all risks rated as moderate or above. Mitigation measures will be presented following the mitigation hierarchy, which requires that risks are anticipated and avoided where possible. Where avoidance is not possible, risks should be minimized to acceptable levels. Any risks that remain following avoidance and minimization should be mitigated.

11. **Measures to avoid risk of COVID-19**: This section will describe the measures that will be taken to avoid the risk of COVID-19 transmission to communities at the sub-project site(s).

12. **Emergency preparedness and response plan**: This section will present an outline of your emergency preparedness and response plan for emergency events, in particular hurricanes, earthquakes and (if relevant) volcanic eruptions.

13. **Measures to mitigate risks relating to security personnel**: If the sub-project involves support to security personnel (park guards, community rangers, etc.), this section will describe the measures you will take in relation to hiring, rules of conduct, training, equipping, and monitoring the action of security personnel, to ensure they do not engage in unlawful or abusive acts against local people.

14. **Timeline and resources**: This section will present and implementation timeline for each measure listed in Sections 10 to 13, together with an estimate of resource needs.

15. **Monitoring arrangements**: This section will outline the steps you will take to monitor and evaluate the effectiveness of the measures listed in Sections 10 to 13.

16. **Disclosure**: CEPF requires that environmental and social instruments are disclosed to affected local communities and other stakeholders prior to sub-project implementation. Please describe the efforts you have taken to disclose this plan.

Annex 12: Stakeholder Engagement Plan Template



Stakeholder Engagement Plan

Date

CEPF Grant xxxxx

Grantee

Sub-project Title

Sub-project Location

Grant Summary

1. Grantee organization.
2. Sub-project title.
3. Grant number.
4. Grant amount (US dollars).
5. Proposed dates of grant.
6. Countries where activities will be undertaken.
7. Date of preparation of this document.

8. **Introduction**: This section will briefly describe the sub-project, including design elements and potential social and environmental issues. Where possible, include maps of the sub-project site(s) and surrounding area.

9. **Summary of previous stakeholder engagement activities**: If you have undertaken any activities to date, including information disclosure and/or consultation, provide the following details:
 - Type of information disclosed, in what form (e.g., oral, brochure, reports, posters, radio, etc.), and how it was disseminated.
 - Locations and dates of any meetings undertaken to date.
 - Individuals, groups, and/or organizations consulted.
 - Key issues discussed and key concerns raised.
 - Grantee's response to issues raised, including any commitments or follow-up actions.
 - Process undertaken for documenting these activities and reporting back to stakeholders.

10. **Project stakeholders**: This section will list the key stakeholder groups who will be informed and consulted about the sub-project. These should include persons or groups who:
 - Are directly and/or indirectly affected by the sub-project (i.e., project-affected parties) or have interests in the sub-project that determine them as stakeholders (i.e., other interested parties); and
 - Have the potential to influence sub-project outcomes.

Key stakeholder groups may include affected communities, non-governmental organizations, local and national authorities, and private landowners. They can also include politicians, companies, labor unions, academics, religious groups, national social and environmental public sector agencies, and media agencies.

11. **Stakeholder engagement program**: This section will summarize the purpose and goals of the stakeholder engagement program. It will briefly describe what information will be disclosed, in what formats, and the types of methods that will be used to communicate this information to each of the identified groups of stakeholders. Methods used may vary according to target audience, for example:
 - Newspapers, posters, radio, television.

- Information centers and exhibitions or other visual displays.
- Brochures, leaflets, posters, non-technical summary documents and reports.

12. **Consultation methods:** This section will describe the methods that will be used to consult with each of the stakeholder groups identified in Section 10. Methods used may vary according to the target audience, for example:

- Interviews with stakeholder representatives and key informants.
- Surveys, polls, and questionnaires.
- Public meetings, workshops, and/or focus groups with a specific group.
- Participatory methods.
- Other traditional mechanisms for consultation and decision-making.

13. **Other engagement activities:** This section will 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 stakeholders. Examples include benefit-sharing programs, community development initiatives, job creation initiatives, and/or training and microfinance programs.

14. **Timeline and resources:** This section will present and implementation timeline for each stakeholder engagement activity listed in Sections 11 to 13, together with an estimate of resource needs.

15. **Monitoring and arrangements:** This section aims to outline what steps you will take to monitor and evaluate the effectiveness of the stakeholder engagement activities listed in Sections 11 to 13.

16. **Consultation:** This section will summarize the consultations carried out with stakeholders in preparation of the plan, particularly any local communities who may be particularly affected by the proposed activities. Include dates of consultations, and a summary of the number of women and men consulted, but do not include names of individuals.

17. **Disclosure:** CEPF requires that environmental and social instruments are disclosed to affected local communities and other stakeholders prior to sub-project implementation. Please describe the efforts you have taken to disclose this Stakeholder Engagement Plan.

18. **Grievance mechanism:** For all sub-projects where a World Bank environmental or social standard applies, the grantee must provide local communities and other relevant stakeholders with a means to raise a grievance, and whereby this grievance may be considered and satisfactorily resolved.

This grievance mechanism must include, at a minimum, the following elements:

- Email and telephone contact information for the grantee organization.
- Email and telephone contact information for the CEPF Regional Implementation Team.
- The [contact](https://secure.ethicspoint.com/domain/media/en/gui/10680/index.html) information for the CI Ethics Hotline (telephone: +1-866-294-8674 / web portal: <https://secure.ethicspoint.com/domain/media/en/gui/10680/index.html>).

- A statement describing how you will inform stakeholders of the objectives of the sub-project and the existence of the grievance mechanism (e.g., posters, signboards, public notices, public announcements, use of local languages).
- A statement that you will share all grievances – and a proposed response – with the Regional Implementation Team and the CEPF Grant Director within 15 days. If the claimant is not satisfied following the response, they may submit the grievance via the CI Ethics Hotline (toll-free telephone line: +1-866-294-8674 / secure web portal: <https://secure.ethicspoint.com/domain/media/en/gui/10680/index.html>). If the claimant is not satisfied with the response from the CEPF Executive Director, they may submit the grievance to the World Bank via the World Bank’s Grievance Redress Service (GRS).

The complainant has the option of approaching the World Bank, if they find the established GRM cannot resolve the issue. **It must be noted that this GRS should ideally only be accessed once the sub-project’s grievance mechanism has first been utilized without an acceptable resolution.** World Bank Procedures require the complainant to express their grievances in writing to World Bank office in Washington DC by completing the bank’s GRS complaint form, which can be found at the following link: <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service#5> . Completed forms will be accepted by email, fax, letter, and by hand delivery to the GRS at the World Bank Headquarters in Washington or World Bank Country Offices.

Email: grievances@worldbank.org
Fax: +1-202-614-7313
By letter: The World Bank
 Grievance Redress Service (GRS)
 MSN MC 10-1018 NW,
 Washington, DC 20433, USA

Addressing Gender-based Violence

The grantee will also need to make special provisions for grievances related to gender-based violence (GBV), due to the need for complaints to be handled by persons with specialist training and adopting a survivor-centered approach. The grantee will be provided with the contact details of a GBV service provider in the sub-project country, and will be required to include them in their grievance mechanisms. Survivors of GBV will have the option of contacting the GBV service provider directly, who will, in-turn, inform the CEPF Secretariat, with the express consent of the survivor.

Following the guidance above, describe the grievance mechanism that you will use.

Annex 13: Template for Adapting the Process Framework



Process Framework

Date

CEPF Grant xxxxx

Grantee

Sub-project Title

Sub-project Location

Grant Summary

1. Grantee organization.
2. Sub-project title.
3. Grant number.
4. Grant amount (US dollars).
5. Proposed dates of grant.
6. Countries where activities will be undertaken.
7. Date of preparation of this document.

8. **Project components**: This section will briefly describe the sub-project, focusing on those components and activities that may involve new or more stringent restrictions on natural resource use. It should also describe the process by which affected persons participated in the sub-project design.

9. **Criteria for eligibility of affected persons**: This section will establish how potentially affected communities will be involved in identifying adverse impacts, and assessing of the significance of any impacts. It will also establish the criteria for eligibility for identifying persons eligible for any mitigating or compensating measures necessary.

10. **Measures to assist affected persons**: This section will describe the mitigation measures to minimize and, where possible, avoid adverse impacts on income and livelihoods. Where needed, measures to assist affected persons in their efforts to improve their livelihoods or restore them, in real terms, to pre-project levels, while maintaining the sustainability of the park or protected area will be identified. This section will also describe methods and procedures by which communities will identify and choose potential mitigating or compensating measures to be provided to persons adversely affected, and the procedures by which adversely affected community members will decide among the options available to them.

11. **Timeline and resources**: This section will present and implementation timeline for each measure listed in Section 10, together with an estimate of resource needs.

12. **Monitoring arrangements**: This section will outline arrangements for participatory monitoring of sub-project activities as they relate to (beneficial and adverse) impacts on persons at the sub-project site(s), and for monitoring the effectiveness of the measures listed in Section 10.

13. **Disclosure**: CEPF requires that environmental and social instruments are disclosed to affected local communities and other stakeholders prior to sub-project implementation. Please describe the efforts you have taken to disclose this Process Framework.

14. **Grievance mechanism**: For all sub-projects where a World Bank environmental or social standard applies, the grantee must provide local communities and other relevant stakeholders with a means to raise a grievance, and whereby this grievance may be considered and satisfactorily resolved.

For ESS5, the Process Framework should describe the process for resolving disputes relating to resource use restrictions that may arise within or among affected communities, as well as grievances

that may arise from members of communities who are dissatisfied with the eligibility criteria, community planning measures, or actual implementation.

This grievance mechanism must include, at a minimum, the following elements:

- Email and telephone contact information for the grantee organization.
- Email and telephone contact information for the CEPF Regional Implementation Team.
- The [contact](#) information for the CI Ethics Hotline (telephone: +1-866-294-8674 / web portal: <https://secure.ethicspoint.com/domain/media/en/gui/10680/index.html>).
- A statement describing how you will inform stakeholders of the objectives of the sub-project and the existence of the grievance mechanism (e.g., posters, signboards, public notices, public announcements, use of local languages).
- A statement that you will share all grievances – and a proposed response – with the Regional Implementation Team and the CEPF Grant Director within 15 days. If the claimant is not satisfied following the response, they may submit the grievance via the CI Ethics Hotline (toll-free telephone line: +1-866-294-8674 / secure web portal: <https://secure.ethicspoint.com/domain/media/en/gui/10680/index.html>).. If the claimant is not satisfied with the response from the CEPF Executive Director, they may submit the grievance to the World Bank via the World Bank’s Grievance Redress Service (GRS).

The complainant has the option of approaching the World Bank, if they find the established GRM cannot resolve the issue. **It must be noted that this GRS should ideally only be accessed once the sub-project’s grievance mechanism has first been utilized without an acceptable resolution.** World Bank Procedures require the complainant to express their grievances in writing to World Bank office in Washington DC by completing the bank’s GRS complaint form, which can be found at the following link: <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service#5> . Completed forms will be accepted by email, fax, letter, and by hand delivery to the GRS at the World Bank Headquarters in Washington or World Bank Country Offices.

Email: grievances@worldbank.org
Fax: +1-202-614-7313
By letter: The World Bank
Grievance Redress Service (GRS)
MSN MC 10-1018 NW,
Washington, DC 20433, USA

Following the guidance above, describe the grievance mechanism that you will use.

Annex 14: Environmental and Social Reporting Template

Grant Summary

1. Grantee organization.
2. Grant title.
3. Grant number.
4. Dates of grant.
5. Period covered by this report.
6. Relevant environmental and social standards.

7. **Summary of activities implemented to comply with environmental and social standards**: This section should describe the actions you took during the reporting period to comply with the requirements of the relevant social and/or environmental standards. It should also include information on any environmental parameters that were monitored. Where relevant, descriptions of meetings with sub-project stakeholders, including persons attending, issues discussed, and actions agreed (if any) should be given.

8. **Grievance redress mechanism**: This section should describe the grievance redress mechanism you have put in place for the sub-project, and list any grievances received during the reporting period, including a summary of actions taken to address them.

9. **Action points**: This section should describe any actions that you need to take to address adverse social or environmental impacts identified during the reporting period. Any actions that require changes to sub-project design should be highlighted.