



DRAFT Environmental and Social Management Framework (ESMF) for consultation and disclosure

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Public Consultation/Disclosure Notice

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The United Nations Development Programme (UNDP) is requesting feedback on the attached draft Environmental and Social Management Framework and associated Social and Environmental Screening Procedures for this project.

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Executive Summary

This Environmental and Social Management Framework (ESMF) has been prepared for the submission of the UNDP project proposal “Conservation and Sustainable Management of Land Resources and High Value Ecosystems in Lake Sevan Basin for Multiple Benefits” to the GEF. Its purpose is to describe the procedure for screening, assessing and managing social and environmental risks of the project via UNDP’s Social and Environment Screening Procedure (SESP). The ESMF will be implemented by the Ministry of Environment through its Environmental Project Implementation Unit (EPIU) involving the Task Leaders and a team of qualified experts and overseen by the UNDP CER Portfolio Manager. The risk management measures will be monitored throughout the duration of the project.

Preliminary analysis and screening conducted during the project development phase via UNDP’s SESP identified potential social and environmental risks associated with project activities. The screening procedure established that the project is rated as being of Substantial risk and identified 13 risks, three of which have been rated as Substantial and ten as Moderate, as follows:

- **Risk 1:** Some project activities such as the Agri-Environmental Payment Scheme and project-supported grants that are at risk of elite capture may discriminate against vulnerable groups (smallholders with less land and capacities) including women and women entrepreneurs and reduce their access to benefits provided through them (Moderate).
- **Risk 2:** Duty bearers - national and local government institutions, responsible for the marzes (regions) and local land use planning do not have adequate technical capacity to plan and enforce in a participatory manner the integrated LDN-compatible land use planning and mainstream biodiversity considerations into local strategies (Moderate).
- **Risk 3:** The LDN compatible Integrated Spatial Land Use Plans and the pastures and forests management plans may lead to short-term or long-term economic displacement. (Substantial).
- **Risk 4:** Restrictions in access to natural resources or its depletion in legally designated parks and protected areas may affect livelihoods of vulnerable groups (Moderate).
- **Risk 5:** The project-supported water/pastures/forests management plans once implemented may have a negative impact on critical biodiversity habitats and species (Substantial).
- **Risk 6:** Project-supported LDN compatible SLM measures and biodiversity conservation activities may lead to increased vulnerability of target areas to climate change impacts (Moderate).
- **Risk 7:** Measures for assisted forest regeneration and improved forest ecosystem management may have unintentional adverse impacts on species or ecosystems (Moderate).
- **Risk 8:** Project workers, including those hired by third party contractors, may be inadvertently exposed to working conditions not in line with international labor standards including those related to child labour and occupational health and safety (Moderate).
- **Risk 9:** The project may inadvertently contribute to perpetuation of discriminations against women. There are lingering disparities between men and women, particularly in rural areas and in the patriarchal cultures of some of the ethnic minority communities, which could be inadvertently replicated or exacerbated (Moderate).
- **Risk 10:** The improved PAs capacities for patrolling, stricter application of environmental regulation (due to improved zoning under the new Management Plan) may impinge on the livelihoods of the nearby communities in the project area (Moderate).
- **Risk 11:** Potential collaboration with local police and improved enforcement/anti-poaching activities in protected areas may facilitate altercations with local communities and traditional subsistence activities. (Moderate)
- **Risk 12:** The project supported demonstration activities may inadvertently cause damage to significant cultural and historical significance sites and/or chance finds. (Moderate)
- **Risk 13:** Small scale construction associated with the monitoring /observation towers in Sevan National Park, the supported small scale hydrotechnical repairs of the irrigation infrastructure at farm level around KBAs/IBAs and some activities associated with the Agri-Environmental Payment Scheme may have negative

impact on critical habitats and species, community and worker health and safety and lead to increased pollution and GHG emissions. (Substantial)

The ESMF requires:

- Additional Screening, as part of site selection, and to update the SESP throughout the life of the project
- Strategic Environmental and Social Assessment for the Integrated Spatial and Land-use Plans (ISLUPs) (Output 1.1.2) and recommendations integrated in the Water-Land Management Plans (Output 3.1.2), Pasture Management Plans (Output 3.1.1), and Forest Management Plans (Output 3.1.3).
- Screening and, if required, targeted assessment or Environmental and Social Impact Assessment (ESIA), for setting up observation towers (Output 2.1.1) and farm hydrotechnical repair works (Output 3.1.2) based on site-screening and requirements of national Environmental Impact Assessment (EIA) legislation.
- Screening and, if required, targeted assessment for demonstration sites (Output 3.1.1, Output 3.1.2, Output 3.1.3) based on site-screening and requirements of national EIA legislation.
- Process Framework will be undertaken during development of ISLUPs (Output 1.1.2), Pasture Management Plans (Output 3.1.1) and Forest Management Plans (Output 3.1.3).
- Updating the project Stakeholder Engagement Plan and Gender Action Plan throughout the project based on the findings of the assessments undertaken.

Abbreviations and Acronyms

EIA	Environmental Impact Assessment
EPIU	Environmental Project Implementation Unit
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
GAP	Gender Action Plan
GEF	Global Environment Facility
GRM	Grievance Redress Mechanism
IBA	Important Bird and Biodiversity Area
ISLUPs	Integrated Spatial and Land Use Plans
KBA	Key Biodiversity Area
LDN	Land Degradation Neutrality
LMP	Labour Management Procedures
M&E	Monitoring and Evaluation
MOE	Ministry of Environment
NGO	Non-Governmental Organization
PAs	Protected Areas
PIMS	Project Information Management System
PIR	Project Implementation Review
PMU	Project Management Unit
PPG	Project Preparation Grant
RP	Responsible Party
SDGs	Sustainable Development Goals
SECU	Social and Environmental Compliance Unit
SES	Social and Environmental Standards (UNDP)
SESA	Strategic Environmental and Social Assessment
SESP	Social and Environmental Screening Procedure (UNDP)
SOP	Standard Operating Procedure
TBD	To be determined
UNDP	United Nations Development Programme
UNDP CO	United Nations Development Programme Country Office
USD	United States Dollar

1 Introduction

This Environmental and Social Management Framework (ESMF) has been prepared for the GEF-funded project “Conservation and Sustainable Management of Land Resources and High Value Ecosystems in Lake Sevan Basin for Multiple Benefits”. The ESMF will be implemented by the Ministry of Environment through its Project Implementation Unit (PIU) involving the Task Leaders and a team of qualified experts and overseen by the UNDP CER Portfolio Manager. The risk management measures will be monitored throughout the duration of the project.

1.1 Project description

The objective of the project is to enhance the resilience of the ecosystems and livelihoods in Sevan Lake through Land Degradation Neutrality (LDN) compatible integrated land-water management in the productive landscapes around Protected Areas (PAs) and Key Biodiversity Areas/Important Bird and Biodiversity Areas (KBAs/IBAs). The components proposed by this project have been designed within available GEF and co-financing framework to address the corresponding drivers of land and biodiversity resources’ decline. The project will deliver Global Environmental Benefits using a participatory approach that ensures promotion of women, youth and vulnerable groups and equitable participation opportunities.

Targeted sites: The targeted project site is the Lake Sevan Basin landscape covering two regions (marzes) Gegharkunik and Vayots Dzor. The targeted regions and communities host most of the life-supporting natural ecosystems, wetlands, Lake Sevan and KBAs/IBAs.

The project’s five components including Outcomes and Outputs are presented below:

Component 1: Promoting Land Degradation Neutrality in Lake Sevan Basin landscape to ensure productivity and ecological landscape resilience.

Outcome 1.1: Land Degradation Neutrality (LDN) in Gegharkunik and Vayots Dzor regions promoted through integrated multi-sectorial landscape approaches. This outcome will be achieved by mapping land degradation trends and drivers, inclusive of gender differentiated analysis on how inequalities and gender imbalance contribute to land degradation, and assessment of its costs. This outcome has four outputs that will contribute towards LDN in Lake Sevan Basin landscape:

Output 1.1.1: Land degradation trends assessed, LDN targets set-up and monitoring system developed for Gegharkunik (534,900 ha) and Vayots Dzor (230,800 ha) marzes/regions, providing a framework to avoid, reduce and restore degraded land through integrated landscape planning.

Output 1.1.2: LDN compatible Integrated Spatial and Land-use Plans (ISLUPs) informed by climate change vulnerability, Economics of Land Degradation (ELD) and biodiversity values in prioritized communities.

Output 1.1.3: Inter-sectoral coordination strengthened to oversee regional LDN target setting and implementation, integrated land use planning and strengthened environmental governance in Lake Sevan Basin landscape

Output 1.1.4: Capacity building programme for regional and local authorities, natural resources users on LDN, SLM and methodologies for land use planning informed by ELD concept.

Component 2: Securing Biodiversity and critical habitats for Biodiversity Services as a baseline for non-deterioration of ecosystem services within Lake Sevan Basin landscape.

Outcome 2.1. Secured biodiversity status in Sevan National Park (147,456 ha) by strengthened PA capacity to better address the key threats to globally significant species and habitats within the main PA/KBA anchoring Lake Sevan landscape. The outcome will focus on securing biodiversity status in Sevan National Park (147,456 ha) by strengthened PA capacity to better address the key threats to globally significant species and habitats within the main PA/KBA anchoring Lake Sevan landscape.

Output 2.1.1: Improved management effectiveness of Sevan National Park through PA regime compliance and enforcement, strengthened PA infrastructure, climate change sensitive integrated monitoring data base, improved patrolling and enforcement capacity of environmental regulation, research and monitoring and species-focused conservation skills and capacities strengthened.

Output 2.1.2: Business Plan and strengthened tourism infrastructure at Sevan National Park; Innovative financing mechanism of the Park's biodiversity values; Public Private Partnerships for the valorisation of Lake Sevan nature values.

Outcome 2.2 Biodiversity conservation assessments and proposed arrangements in Lake Sevan landscape in place for the biodiversity hot-spots outside the PA. The outcome will target biodiversity values in the production landscape in the PA vicinity, and support their integration within the landscape, therefore supporting the key ecosystem services on which local livelihoods endure.

Output 2.2.1 Key Biodiversity Areas (KBAs) and other biodiversity hotspots in Lake Sevan Basin landscape, situated outside the PA, identified, mapped, conservation status assessed, and climate sensitive conservation measures mainstreamed into the Integrated Spatial and Land Use Plans/ISLUPs (used as input into Outputs 1.1.2, 3.1.1 and 3.1.3).

Component 3: Promoting sustainable and biodiversity friendly economic development and incentives for local communities in Lake Sevan landscape.

Outcome 3.1: Biodiversity friendly and LDN compatible SLM practices promoted in Lake Sevan production landscape. Under this outcome, the project will demonstrate SLM measures on 10,000 ha of irrigated agricultural land; 150,000 ha pastureland; 8,000 ha of forest ecosystems that will be brought under sustainable management regimes, compatible with the LDN approach.

Output 3.1.1: Sustainable pasture management plans at targeted village level, aligned with the LDN assessment and the Integrated Spatial and Land Use Plans (ISLUPs), including biodiversity measures for palearctic grasslands conservation; 10 Pasture Users Associations capacitated to apply biodiversity friendly SLM measures to achieve LDN and resilient livelihoods.

Output 3.1.2: Climate sensitive and LDN compatible Integrated Water-Land Management Plans in selected municipalities leading to soil improvement through innovative irrigation technologies and climate resilient crop farming aligned with LDN principles; strengthened capacity of WUAs to demonstrate sustainable crop farming and agroforestry measures.

Output 3.1.3: Sustainable Forest Management Plans addressing forest degradation and ecological connectivity through sustainable forestry measures and assisted regeneration.

Output 3.1.4: Investments in community-based biodiversity friendly sustainable use measures and support to small eco-tourism operators in the PA, KBAs buffer zones and corridors, aiming to provide alternative income to local communities.

Component 4: Knowledge management and Learning

Outcome 4.1: Best practices and lessons are accessed and applied in other production landscapes and micro-catchments in the country and in the region. The project will build upon previous similar experience, and will identify, analyse, and share lessons learned that might be beneficial in the design and implementation of similar future projects. The project will identify and participate, as relevant and appropriate, in scientific, policy-based and/or any other networks, which may be of benefit to project implementation through lessons learned.

Output 4.1.1: Increased knowledge and awareness among local communities and decision makers about LDN and key values of Lake Sevan Basin in connection with the use of water and biodiversity ecosystem services.

Output 4.1.2: Experience, best practices and lessons learned about LDN, SLM, biodiversity and water management, captured, systematized and made available through various platforms for public and private stakeholders for use in other production landscapes and catchment areas in the country and in the region.

Component 5: Monitoring and Evaluation

Outcome 5.1: Project M&E system and monitoring of Global Environmental Benefits (GEB) provide for continuous learning and adaptive management. This outcome includes a functioning project M&E system, monitoring, and assessment of global environmental benefits and co-benefits disaggregated by gender that will be generated by the project. It will also include a mid-term and final evaluation.

Output 5.1.1: Set of monitoring and evaluation activities implemented. Monitoring and evaluative knowledge systematically integrated into project management and planning.

1.2 Purpose and scope of this ESMF

At this stage, not all the activities have been fully specified in terms of locations and interventions, and as such they cannot be fully assessed for all the potential social and environmental risks and impacts. This ESMF has been therefore prepared to set out the principles, rules, guidelines, and procedures for screening, assessing, and managing the potential social and environmental impacts of the project as they are developed and designed in line with the requirements of UNDP's Social and Environmental Standards (SES) and national guidelines. The Implementing Partner (Ministry of Environment of the Republic of Armenia) and Responsible Party (WWF Armenia) of the project and the Environmental Project Implementation Unit (EPMU) will monitor the ESMF implementation, starting with Project Inception stage to ensure the environmental and social risks and impacts are fully assessed and management measures are in place prior to the implementation of the relevant project activities.

This ESMF identifies the steps for detailed screening and assessment of the project's potential, currently-identified social and environmental risks, and for preparing and approving the required management plans for avoiding, and where avoidance is not possible, reducing, mitigating, and managing the identified adverse impacts of this project. Its scope covers all project activities described in Section 1.1 to the extent that they have been identified during this phase of project development.

1.3 Potential Social and Environmental Impacts

During the PPG phase, the UNDP SESP was used to identify potential social and environmental risks associated with this project. The project was scrutinized as to its type, location, scale, sensitivity and the magnitude of its potential social and environmental impacts. All project activities were screened, including planning support, policy advice, and capacity-building, and site-specific, physical interventions. The screening highlighted the project intentions as they related to mainstreaming human rights, gender equality and women's empowerment and environment sustainability.

The SESP identified a total of thirteen risks, three of which have been assessed as having Substantial significance while the remaining ten of Moderate significance; hence overall SESP risk categorization rating for the project is "Substantial".

Substantial Risk: as defined by UNDP's SESP, "Projects that include activities with potential adverse social and environmental risks and impacts that are more varied or complex than those of Moderate Risk projects but remain limited in scale and are of lesser magnitude than those of High Risk projects (e.g. reversible, predictable, smaller footprint, less risk of cumulative impacts)".

The followings are the project risks and their significance as identified in the completed SESP found in Annex 9.1:

- **Risk 1: Some project activities such as the Agri-Environmental Payment Scheme and project-supported grants that are at risk of elite capture may discriminate against vulnerable groups (smallholders with less land and capacities) including women and women entrepreneurs and reduce their access to benefits provided through them. (Moderate).** Women may be underrepresented, due to ingrained social and cultural norms. Local communities located at the border with Azerbaijan in proximity of Nagorno Karabakh conflict area have been massively affected by the war. The needs of displaced people, war veterans, wounded, newly disabled and their families, families who lost a breadwinner or productive assets, will need to be prioritized based on principles of humanity, neutrality, impartiality and independence. Project activities may therefore not fully incorporate or reflect views of women and vulnerable communities and ensure equitable opportunities for their involvement and benefit. Associated activities: 3.1.1, 3.1.2 and 3.1.4.
- **Risk 2: Duty bearers - national and local government institutions, responsible for the marzes (regions) and local land use planning do not have adequate technical capacity to plan and enforce in a participatory manner the integrated LDN-compatible land use planning and mainstream biodiversity considerations into local strategies (Moderate).** Low capacities at regional, municipalities and settlements/village levels are many times resulting in little or no instructions for sustainable and integrated land use planning and sustainable management of pastures and forests and inadequate monitoring. Associated activities: Overall.
- **Risk 3. The LDN compatible Integrated Spatial Land Use Plans and the pastures and forests management plans may lead to short-term or long-term economic displacement (Substantial).** Demarcation of new areas that are designated as protected areas or changes in natural resource management requirements in existing areas may lead to restrictions in land use or use of natural resources in those areas and thus result in economic displacement for the local communities, who are primarily located in rural areas with a high percentage of unemployed and poor; women constitute a substantial part of small-holders. There is a risk that these groups will be negatively affected by the restricted availability, quality and access to natural resources. Associated activities: 1.1.2, 3.1.1, 3.1.2 and 3.1.3.
- **Risk 4: Restrictions in access to natural resources, or its depletion, in legally designated parks and protected areas may affect livelihoods of vulnerable groups (Moderate).** Illegal grazing is frequent in the PA areas which aren't demarcated on-the ground, as in case of "Lichk-Argichi" reserve zone, the "Gilli" and "Artanish" reserve zones, which are regularly grazed by cattle from the villages of Tsovak (2,300 inhabitants) and Geghamasar (1,100 inhabitants), and Shoghakat (1,100 inhabitants) and Artanish (760 inhabitants), respectively. The "Juniper Oak Woodlands" sanctuary is regularly grazed by small cattle from the villages of Jil (680 inhabitants), Tsapatagh (360 inhabitants), Pambak (550 inhabitants) and Daranak (190 inhabitants). Regulatory enforcement alone seems not to be effective. Illegal fishing is even more problematic, it involves approximately thousand people directly involved in fishery (both legal and illegal) and estimated 3-5 thousand people involved in fish business (fish smoking, caning, transportation, sale-resale, exporting). Changes to the resource use and management regimes and improved enforcement could affect the enjoyment of business-as-usual short-term direct benefits to the resource users in the targeted area. Associated activities: 1.1.2, 3.1.1, 3.1.2, 3.1.3.
- **Risk 5. The project-supported water/pastures/forests management plans once implemented may have a negative impact on critical biodiversity habitats and species. (Substantial).** The risks considered here are related to potential inadequate design and implementation of water and SLM measures e.g. although the water management planning will indicate the technology to be used and will recommend SLM practices (such as crop rotation; agroforestry measures) in order to reduce water wastage and improved resource efficiency, there is the risk that these measures will lead to decrease of natural resources (e.g. choice of water irrigation technology would lead to increase water consumption); another example would be the inadequate planning for forest regeneration that may harm surrounding nesting/feeding areas of rare or endangered species. The pasture management plans may inadvertently plan for seeding of invasive species etc. Cumulative risks on biodiversity and natural resources to the area, including risk associated with increased tourism activities are also expected. Associated activities: 1.1.2, 2.1.2, 3.1.1, 3.1.2 and 3.1.3.
- **Risk 6. Project-supported LDN compatible SLM measures and biodiversity conservation activities may lead to increased vulnerability of target areas to climate change impacts (Moderate).** Climate change is

affecting Armenia's natural ecosystems and lake Sevan landscape is affected by extreme climate events such as drought, hail, floods. Soil erosion and vegetation cover loss are exacerbated by climate change. Project supported activities, especially those related to agricultural development, may lead to land or resources changes that increase the vulnerability of target areas to climate change. Associated activities: 1.1.2, 3.1.1, 3.1.2 and 3.1.3.

- **Risk 7: Measures for assisted forest regeneration and improved forest ecosystem management may have unintentional adverse impacts on species or ecosystems (Moderate).** The project will design measures for the sustainable management of 8,000 forest ecosystems; of which approx. 2,200 ha will host demonstration activities of forest restoration measures. Associated activities: 3.1.3.
- **Risk 8: Project workers, including those hired by third party contractors, may be inadvertently exposed to working conditions not in line with international labor standards including those related to child labour and occupational health and safety (Moderate).** In addition to directly hiring workers for implementation of project activities, the project will support smallholders and small private rural entrepreneurs (small tourism operators; farmers' associations) to green their investments and access financing in order to implement local initiatives such as sustainable grasslands management and other alternative income generating activities that will boost their livelihoods. Likelihood of non-observance of UN standards and policies of labor and working conditions especially child labor has been considered based also on some existing reports: <https://www.dol.gov/agencies/ilab/resources/reports/child-labor/armenia> Associated activities: 2.1.1, 3.1.2 and 3.1.4.
- **Risk 9: The project may inadvertently contribute to perpetuation of discriminations against women. There are lingering disparities between men and women, particularly in rural areas and in the patriarchal cultures of some of the ethnic minority communities, which could be inadvertently replicated or exacerbated (Moderate).** The Project could potentially perpetuate discriminations against women based on gender, especially regarding participation in the implementation of different training activities, support to accessing financing instruments for SLM, or access to other project-supported opportunities. In the targeted regions, women account for around 51-52% of the population. Many women form part of the unpaid family labor in home farming and lease of agricultural lands. Associated activities: Overall.
- **Risk 10: The improved PAs capacities for patrolling, stricter application of environmental regulation (due to improved zoning under the new Management Plan) may impinge on the livelihoods of the nearby communities in the project area (Moderate).** The EU4Sevan Project is developing the new Sevan National Park Management Plan. Enhanced protection regime and a better zoning and delineation of on-the-ground of PAs core and buffer areas (supported by the EU4Sevan Project) coupled with increased patrolling (supported by the GEF Project), may bring along potential risks of restrictions/limitations on the use of natural resources that may be at odd with the current agricultural practices of the local communities in project areas. Associated with that is the risk that not all key user groups of natural resources at project sites are consulted in project design and implementation and they will be affected by the restrictions on the use of natural resources. Associated activities: Overall.
- **Risk 11: Potential collaboration with local police and improved enforcement/anti-poaching activities in protected areas may facilitate altercations with local communities and traditional subsistence activities (Moderate).** The project could facilitate institutional agreements with local police in order to combat illegal activities such as poaching and illegal logging in the targeted PAs. Enforcement issues of the environmental regulations may lead to conflicts between the PA rangers and the local community. Associated activities: 1.1.2, 3.1.1, 3.1.2 and 3.1.3.
- **Risk 12: The project supported demonstration activities may inadvertently cause damage to significant cultural and historical significance sites and/or chance finds. (Moderate).** The targeted municipalities and demonstration sites have been carefully selected. However, given Armenia's rich cultural heritage the risk is present, and it is assessed as moderate. Associated activities: 2.1.1, 3.1.2 and 3.1.4
- **Risk 13: Small scale construction associated with the monitoring/observation towers in Sevan National Park, the supported small scale hydrotechnical repairs of the irrigation infrastructure at farm level around KBAs/IBAs and some activities associated with the Agri-Environmental Payment Scheme may have negative impact on critical habitats and species, community and worker health and safety and lead to**

increased pollution and GHG emissions (Substantial). Under Output 2.1.1 the project will support the construction of observation towers for monitoring of birds and any fire hazards that will be enabling rapid interventions. There is a limited risk of habitat disturbance at site. Under the Agri-Environmental Payment Scheme Output 3.1.1, some activities may include conversion of steppe ecosystem to fodder plots, affecting sensitive biodiversity nearby. Under Output 3.1.3 the project will support several small scale hydrotechnical repairs in the selected villages, which are outside of the PA. Some villages are in proximity to KBAs/IBAs however at considerable distance from any observed bird colonies. Associated activities: 2.1.1, 3.1.1 and 3.1.3.

2 Legislation and Institutional Frameworks for environmental and social matters

This section provides a preliminary review of the policy, legal and institutional (PLR) framework related to the potential risks and benefits of the proposed project and prospective activities to be implemented with the use of the funding received. The legal institutional framework underpins how social and environmental safeguards will be addressed and respected.

2.1 National legislation, policies and regulations

2.1.1 Institutional framework

The Ministry of Environment (MoE) is principally responsible for natural resource management and biodiversity conservation. Armenian law gives the MoE ultimate management authority over all four Protected Area types (Reserves, National Parks, Natural Monuments and Sanctuaries). The MoE currently manages eight Sanctuaries. The MoE also manages all forested lands in Armenia through “Hayantar” (Armenian Forestry).

2.1.2 Environmental Governance

In accordance with article 12 of the **Constitution of the Republic of Armenia** (adopted in 1995 and amended in 2005 and 2015) “The State stimulates protection, improvement and restoration of the environment and reasonable use of the natural resources based on the principle of steady development and taking into account the responsibility to the future generation. Everybody is obliged to take care of environmental protection”. Article 85 of the constitution provides that “Everyone has, in accordance with the law, the right of health protection”. Other laws related to environmental governance include:

- The **Law on Environmental Oversight (2005)** regulates the organization and enforcement of oversight of national environmental legislation and defines the legal and economic basis underlying the specifics of oversight over the fulfilment of environmental requirements and relations between the parties. The existing legal framework relating to natural resources and environmental includes a range of legal tools. Government decrees are the key legal instruments for implementing environmental laws. The other tools are Presidential orders, Prime-Minister’s resolutions, and ministerial decrees.
- According to the **Law on Environmental Impact Assessment and Expert Examination (2014)**, the types of activities, which should undergo an Environmental Impact Assessment (EIA) are divided into A, B and C categories depending on their expected impact on the environment. In addition to defining general EIA principles and procedures, the EIA Law also introduces the concept of strategic assessment, and defines activities subject to strategic assessment. The Law defines strategic assessment as the process of evaluating the possible total and cumulative impact of a proposed fundamental document (policy, strategy, concept paper, outline, the scheme of utilization of natural resources, a project, layout, urban development program document). Therefore, according to this law, a fundamental document related to socioeconomic, energy sector, urban development, transport sector, communication sector, agriculture, underground resources utilization, industrial sectors, health care, environmental, recreation sector, sector of services, forestry, waste utilization, waterworks systems spheres shall be subject to strategic environmental assessment (SEA). However, in practice, the decision on the need for a strategic assessment is done on a case-by-case basis based on a pre-assessment/screening¹. The

¹ UNECE (2022). Questionnaire for the report of Republic of Armenia on the implementation of the Protocol on Strategic Environmental Assessment in the period 2019–2021 (Link at https://unece.org/sites/default/files/2022-10/ece.mp_eia_wg2_2022.4_as%20submitted.docx)

law also requires public consultation on the required assessment through conducting public hearings and obtaining written feedback from the public to the relevant authorities.

2.1.3 Biodiversity Conservation and Cultural Heritage

- The **Law on Fauna (1999²)** describes state policy regarding conservation, protection, reproduction and use of species of wild fauna. The subjects of that law are: 1) conservation, protection, natural reproduction of genetic and species diversity, 2) prevention of infringement of comprehensiveness of animals' living environment, 3) protection of comprehensiveness of animal species, their populations and relatives, 4) protection of animals' migration routes and 5) regulation of relationships regarding using of objects of fauna. Responsibilities of different organizations, including government, ministries, state bodies, local self-governmental bodies are envisaged by that law.
- The **Law on Flora (1999)** describes state policy regarding approved science-based protection, conservation, use and reproduction of natural flora.
- The **Law on Special Protected Areas of Nature (2006)** regulates special protected areas in Armenia and eco-systems that have environmental, economic, social, scientific, educational, historical, cultural, healthcare and recreation value. It also outlines the legal basis for state policies regarding sustainable development, restoration, protection, reproduction and use of natural objects and complexes. The Law defines four categories of protected areas in Armenia: (1) State Reserves; (2) National Parks; (3) Sanctuaries; and (4) Nature Monuments.
- The **Law on Lake Sevan (2001)** establishes legal and program framework of the state policy for restoration, reproduction, protection and use of natural resources of Lake Sevan as of an ecosystem that has a strategic significance and economic, social, scientific, historical-cultural, esthetical, recreational and spiritual value for the Republic of Armenia.
- The **Forest Code (2005)** regulates sustainable management of forests: guarding, preserving, rehabilitation, afforestation and rational use of forests and forest lands in Armenia as well as with forest stock-taking, monitoring and control.
- The **Law on Intangible Cultural Heritage (2009)** regulates the legal relations arising from the processes of preservation, safeguarding, and development of intangible cultural heritage, including identification, documentation, research, application, recreation, teaching, and dissemination of intangible cultural values, protection of the property rights over such values, maintenance of intangible cultural heritage of Armenia, international cultural cooperation, cultural communication between peoples of foreign countries and those of the RA.
- The **Law on Protection and Use of Immovable Cultural and Historic Monuments and Historic Environment (1998)** provides the legal and policy basis for the protection and use of such monuments in Armenia. Article 15 of the Law describes procedures for discovering and registering monuments, establishing protection zones around them and creating historical and cultural reserves. Article 22 stipulates that the land plots located in historically sensitive areas can be allocated for construction, agricultural and other activities only upon approval of the authorized state body (Department of Historic and Cultural Monuments Preservation).
- **Law on Nature Protection and Nature Utilization Payments (1998)** provides obligatory payment to the state or community budget for implementation of nature protection measures, use and (or) sale of natural resources, which are considered state property. According to the law the nature utilization fee is a payment to the state budget for efficient, complex use of natural resources considered state property or a compensation payment for use and (or) sale of these natural resources.
- **Law on Control Over Use and Protection of Lands (2008)** defines the issues of effective use and protection of land, supervision of compliance with the requirements of land legislation, forms, supervisory authorities, rights and responsibilities of inspectors, procedures for inspections. It oversees the protection and use of lands within the respective jurisdiction by the highest body of professional

² The year of adoption of the Law is reflected. Almost all legislative acts have amendments ongoing, which are not indicated here.

supervision established by the RA Law on Local Self-Government-State Authorized Body; the governors and community leaders.

2.1.4 Land Acquisition and Land Use Restriction, and Management

- The **Land Code (2001)** defines the key provisions for land-use in Armenia. Land is classified as per designated purposes (categories) into: 1) agricultural land, 2) settlement land, 3) industrial, mining and other production designation land, 4) land for energy, transport, communication, utility infrastructure facilities, 5) land for specially protected areas, (6) special designation land, 7) forest land, 8) water land, and 9) reserve land. According to the Code, possession, using and disposal of land must not damage the environment, security and defensibility of the state as well as must not violate rights and interests of citizens and other persons that are protected by the law.
- The **Law on surveillance over the land use and land conservation (2008)** provides objectives and types of effective use and conservation of RA lands, inspection related to enforcement of land legislation and institutions, procedures of control, rights and responsibilities of entities controlling land use and protection. The Law applies to all lands of the RA Land Fund, irrespective of purpose, ownership and/or right to use.
- The **Law on alienation of property for overriding interests of the public (2006)** defines procedures for determining the overriding public interest, for alienating property in order to ensure public interest and for compensation for the alienated property. This law applies to all land ownership (real or movable estate, property rights, equities, etc.) located and registered in Armenia and belonging to physical persons, legal entities and communities. The constitutional conditions for the alienation of property in order to ensure overriding interests of the public are: (i) the alienation must be carried out in exceptional cases defined by the law and in accordance with the procedure established by the law; and (ii) adequate compensation must be paid for the alienated property.

2.1.5 Resource Efficiency and Pollution Prevention and Management

- The **Law on Atmospheric Air Protection (1994)** regulates air quality as well as public relations in the field of prevention and reduction of adverse chemical, physical and biological impacts on air. The Law also regulates emission permits and provides permissible limits/concentrations for atmospheric air emissions. The RA Government Decree No.160-N dated 02.02.2006 defines maximum permissible concentrations of ambient air pollution in residential areas
- The **Law on Waste (2004)** provides the legal and economic basis for collection, transportation, disposal, treatment, re-use of wastes as well as prevention of negative impacts of waste on natural resources, human life and health. It defines the roles and responsibilities of state authorities as well as of waste generator organizations in waste management activities
- The **Water Code (2002)** provides the legal basis for protection of water resources, the provision of water for people and economic sectors through effective management of water resources and ensuring the protection of water resources for future generations. The Water Code includes the following: responsibilities of state/local authorities and public, development of the national water policy and national water program, water cadastre and monitoring system, public access to relevant information, water use and water system use permitting systems, trans-boundary water resources use, water quality standards, safe operation of hydraulic facilities, protection of water resources and state supervision.
- **Law of the Republic of Armenia on Water User Associations and Federations of Water User Associations (2002)** define the operational basis of Water Users' Associations and Federations of Water Users' Associations, the grounds for establishment and termination thereof, as well as the principles of relationships with state bodies aimed at increasing the operational effectiveness of the Republic of Armenia irrigation system.

2.1.6 Labour

- The **Labour Code (2004)** regulates collective and individual employment relationship; defines the basis and procedure of implementation for the establishment, revision and cessation of that relationship; assigns duties, authorities and responsibilities of the parties of employment relationship, as well as

defines conditions for OHS. The Labour Code also recognizes workers' rights to form and to join workers' organizations of their choice, contains provisions for enabling collective bargaining, and prohibits any type of forced labour.

2.2 International Conventions

Armenia is a signatory to several multilateral agreements and conventions that are relevant to the project. These include but are not limited to the following:

- Paris Agreement, 2017
- Conservation of Migratory Species of Wild Animals (Bonn), 2011
- Convention on International Trade in Endangered Species of Wild Fauna and Flora (Washington), 2008 (Accession)
- The Convention on the Conservation of European Wildlife and Natural Habitats (Bern), 2008
- European Landscape Convention (Florence), 2004
- Convention on Environmental Impact Assessment in a Transboundary Context, 1996
- Convention on the Elimination of All Forms of Discrimination against Women, 1993 (Accession)
- Convention on Wetlands of International Importance (Ramsar), 1993
- Convention on Biological Diversity (Rio de Janeiro), 1993
- Kyoto Protocol, 2003
- UN Framework Convention on Climate Change, 1993
- C029 Forced Labour Convention, 1930 (No. 29), 2004
- C087 Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87), 2006
- C098 Right to Organise and Collective Bargaining Convention, 1949 (No. 98), 2003
- C100 Equal Remuneration Convention, 1951 (No. 100), 1994
- C105 Abolition of Forced Labour Convention, 1957 (No. 105), 2004
- C111 Discrimination (Employment and Occupation) Convention, 1958 (No. 111), 1994
- C138 Minimum Age Convention, 1973 (No. 138) Minimum age specified: 16 years, 2006
- C182 Worst Forms of Child Labour Convention, 1999 (No. 182), 2006

2.3 UNDP's Social and Environmental Standards

UNDP's Social and Environmental Standards (SES) in effect as of 1 January 2021, underpin UNDP's commitment to mainstream social and environmental sustainability in its programs and projects to support sustainable development, and are an integral component of UNDP's quality assurance and risk management approach to programming. Through the SES, UNDP meets the requirements of the GEF's Environmental and Social Safeguards Policy. The objectives of the SES are to:

- Strengthen the social and environmental outcomes of Programs and Projects
- Avoid adverse impacts to people and the environment
- Minimize, mitigate, and manage adverse impacts where avoidance is not possible
- Strengthen UNDP and partner capacities for managing social and environmental risks
- Ensure full and effective stakeholder engagement, including through a mechanism to respond to complaints from project-affected people

UNDP uses its Social and Environmental Screening Procedure (SESP) to identify potential social and environmental risks and opportunities associated with all proposed projects. All project components are screened, including planning support, policy advice, and capacity-building, as well as site-specific, physical

interventions. Activities that will be completed under project co-financing are also included in the scope of the assessment.

Where projects are rated as being High, Substantial or Moderate Risk, some form of social and environmental assessment is required, together with the identification of management mechanisms to mitigate identified risks. The assessment must be commensurate with the magnitude and severity of foreseen risks.

The nature of the assessment will vary according to the type of risk foreseen. Where potential impacts are foreseen from “upstream” project activities, such as those involving planning support, policy advice and reform, or capacity building, they are typically assessed using forms of Strategic Environmental and Social Assessment (SESA). Risks and impacts associated with projects that have a physical footprint (“downstream” activities) are typically addressed through an Environmental and Social Impact Assessment (ESIA) or targeted on-the-ground assessments.

The screenings conducted during project development indicate that ten of the eleven social and environmental principles and standards have been triggered for the project due to ‘moderate’ and ‘substantial’ risks:

- Human Rights (due to the potential exclusion of women, youth, veterans, migrants, war refugees, from project activities especially those related to the planning of natural resources use and decisions that may affect their livelihoods)
- Gender Equality and Women’s Empowerment (due to potential inadvertent perpetuation of gender stereotypes)
- Accountability (due to potential inadvertent exclusion of marginalised people from project activities and decision making affecting their livelihoods; failure to include transparency in decision making over land use planning, and pasture/forest management measures)
- Standard 1: Biodiversity Conservation and Sustainable Natural Resource Management (due to potential support to activities that may not apply appropriate conservation measures, which could have negative impact on the natural resources)
- Standard 2: Climate Change and Disaster Risks (due to potential failure to build climate resilience into the project outputs and/or potential vulnerability of project outputs to extreme climate events drought or floods)
- Standard 3: Community Health, Safety and Security (due to safety risks associated with construction activities that we will be undertaken as well as security risks from collaboration with local police and gendarmerie to improve enforcement/anti-poaching activities)
- Standard 4: Cultural Heritage (due to potential failure to include management measures for culturally significant sites or cultural heritage sites or chance finds)
- Standard 5: Displacement and Resettlement (due to potential economic displacement of local communities stemming from the improved enforcement of environmental legislation in the PA and enforcement of land use and water use management planning)
- *Standard 6: Indigenous People (not triggered as UNDP definition of “Indigenous People” was carefully considered in the context of Armenia leading to the conclusion that the Standard does not apply in the country.)*
- Standard 7 Labour and Working Conditions (due to inappropriate observance of standard labour and working conditions especially in construction activities undertaken in the project)
- Standard 8: Pollution Prevention and Resource Efficiency (due to potential negative impact of small-scale construction activities in the PA and on farmlands)

A summary of the risk significance under each SES principle and standard, and the project-level safeguard standards triggered by each project (indicated with ticks) are shown in Table 1.

Table 1: Summary of safeguards triggered based on screening conducted during project preparation

Principle / Standard	Risk Rating	Assessment and Management
Human Rights	√ Substantial	GAP, SEP, SESA, Process Framework
Gender Equality and Women’s Empowerment	√ Substantial	GAP, SEP, SESA, Process Framework
Sustainability and Resilience		
Accountability	√ Substantial	GAP, SEP, SESA, Process Framework
Project-level Standards		
Standard 1: Biodiversity Conservation and Sustainable Natural Resource Management	√ Substantial	Targeted assessments and ESIA/ESMP (to be confirmed – TBC)
Standard 2: Climate Change and Disaster Risks	√ Substantial	Targeted assessments and ESIA/ESMP (TBC)
Standard 3: Community Health, Safety and Security	√ Substantial	Targeted assessment/ESMP (TBC)
Standard 4: Cultural Heritage	√ Moderate	Targeted assessments and ESIA/ESMP (TBC)
Standard 5: Displacement and Resettlement	√ Substantial	SESA/ Process Framework
Standard 6: Indigenous Peoples	-	-
Standard 7: Labour and Working Conditions	√ Substantial	LMP, Targeted assessments and ESIA/ESMP (TBC)
Standard 8: Pollution Prevention and Resource Efficiency	√ Substantial	Targeted assessments and ESIA/ESMP (TBC)
Number of risks in each risk rating category		
High	0	
Substantial	3	
Moderate	10	
Low	0	
Total number of project risks	13	
Overall Project Risk Categorization	Substantial	
Number of safeguard principles and standards triggered	10 (or 7 standards)	

2.4 Gaps in policy framework

At this stage, no gaps were found between the environmental and social national legislation and UNDP SES. However, the SESAs, ESIA and targeted assessments will include further analysis of the legal and policy frameworks that apply to the project, identifying gaps and strategies to enable the project’s upstream activities to operate with and alongside state and federal jurisdictional realms.

3 Procedures for Screening, Assessing and Managing Social and Environmental Impacts

In accordance with the SES, and due to the **Substantial** overall risk category, social and environmental assessments, including the identification of management mechanisms to mitigate identified risks, must be undertaken such that no project activity that is being assessed for potential impacts can commence before the associated assessment has been undertaken and management plans are in place, as described in the sections that follow.

3.1 Selection of Agri-Environmental Payment Scheme (Output 3.1.1) and Project-supported Grants (Output 3.1.4)

Clear environmental and social criteria in accordance with UNDP SES will be used during selection of activities that will be funded under the Agri-Environmental Payment Scheme (Output 3.1.1) and project-supported grants (Output 3.1.4). In addition, each selected activity or types of grant supported activities will undergo a general SES screening to assess potential risks and determine further assessment and management requirements.

3.2 SESAs for Output 1.1.2

A SESA will be undertaken during development of each ISLUP (Output 1.1.2) such that the resulting recommendations will be integrated into the plans, as well as into the pursuant Pasture Management Plans (Output 3.1.1), Integrated Water-Land Management Plans (Output 3.1.2), and Forest Management Plans (Output 3.1.3). The SESAs will take into consideration all risks identified in the SESP and ensure that they are assessed according to SES and that the findings and recommendations of the assessment have been integrated into the prepared plans. The SESAs will be conducted in line with UNDP SES and national EIA legislation.

Process Framework: A Process Framework (PF) is prepared when UNDP-supported projects may cause restrictions in access to natural resources in legally designated parks and protected areas. The purpose of the process framework is to establish a process by which members of potentially affected communities participate in the design of project components, determination of measures necessary to address the requirements of SES Standard 5, and implementation and monitoring of relevant project activities. The level of detail of the PF may vary depending on project activities, characteristics of restrictions and their impacts, and the number of persons affected. The PF supplements the project's environmental and social assessment with a participatory framework focused on the potential impacts of access restrictions. The standard PF template can be found in chapter 9.2.

A PF will be undertaken during development of any of the plans if it was found that additional restrictions on lands or natural resources may be incurred. Project-facilitated consultations with the local communities who are living in and around the targeted areas, or depend on them for their livelihoods, must therefore ensure that the new or improved protection regime is properly understood by the local communities and that the proposed conservation measures are supported by the local communities. The Consultations shall be aligned with or complement (if needed) the public participation provisions included in the Law on Environmental Impact Assessment and Expert Examination. During the consultations, the Project will ensure that any potential risk of economic displacement in the affected communities resulting from implementation of the relevant plan will be properly assessed and if confirmed, appropriately mitigated through compensatory measures. The compensatory measures will be identified during the project's SESAs. The formal approval of the plans will not commence before securing consensus/endorsement of the local communities over the targeted areas, management arrangements and monitoring measures. The PF will be supported at local level by project experts including representatives of local governing bodies and local Non-governmental Organizations (NGOs).

3.3 Screening and targeted assessment or ESIA for works in Outputs 2.1.1 and 3.1.2

Sites selected for setting up observation towers (Output 2.1.1) and repair works for farm hydrotechnical infrastructure (Output 3.1.2) will be individually screened with the SESP and based on these results, as well as the requirements of national EIA legislation, a targeted assessment or scoped ESIA will be conducted, as needed, in order to identify, prevent and mitigate potential impacts on ecologically sensitive habitats, community health and safety, worker safety and the physical environment. The assessment may result in site-specific ESMPs to be implemented during construction works such that these works will not commence until all necessary plans are in place.

The preparation of the targeted assessment or Scoped ESIA and ESMP will require the retaining of a consultant. This cost has already been included in the overall budget of the project. Where required, the ESIA will cover the following:

- Assess project activities at the scale deemed appropriate for compliance with the SES.
- Identify environmental and social sensitive receptors within the activity's area of influence.
- Address all relevant issues related to the SES Overarching Principles and Project-level Standards, as identified in the project's SESP and any other issues identified in the course of the ESIA.

The output of each scoped ESIA will be an ESIA report (indicative outline can be found in Annex) and site-specific ESMPs. The site-specific ESMPs will define desired social and environmental management outcomes and specify social and environmental indicators, targets, or acceptance (threshold) criteria to track ESMP implementation and effectiveness. It will also provide estimates of the human and financial resources required for implementation and monitoring and identify organizational structure and processes for implementation. They will likely include an Occupational Health and Safety Plan, Pollution Prevention and Management Plan and others as required. If needed, a Cultural Heritage Management Plan, that includes a chance finds procedure, will be developed and implemented. An indicative outline of the ESMP can be found in Annex 9.4 of this ESMF.

Labour Management Procedures: UNDP S7 requires that written labour management procedures (LMP) be established that set out the conditions under which project workers will be employed or engaged and managed. This applies to all third party contractual arrangements with the private sector (or any other entity).

Therefore, all private sector actors (or any other entity) that will be engaged in the project, particularly under the pilots, will adhere to the LMP to ensure compliance with SES prior to engagement in any project activity. Private enterprises that will provide services within the project shall also sign a safeguards commitment letter to implement all measures stipulated in the ESMF.

Annex 9.5 provides a template for this LMP that will be developed during the inception phase of the project. To the extent that provisions of national law and employer policies satisfy the requirements of S7, these would be applied and the applicable party would not need to duplicate such provisions in additional project-specific labour management procedures. An assessment, undertaken as part of the scoped ESIA's and targeted assessments, should identify whether the applicable party (employer, contractor) has appropriate human resources policies and occupational health and safety management procedures to address and manage identified labour risks and impacts and to meet the S7 requirements.

The LMP requirements shall:

- Comply with minimum age threshold set out in International Labor Organization (ILO) Conventions or national legislation (whichever offers the greatest protection to young people under the age of 18) and expect certification by contractor that children under 18 are not employed in hazardous work, and if involved are only doing light work with security and safety standards respected and enforced.
- Check the activities carried out by young workers and ensure that children under 18 are not employed in hazardous work, including in contractor workforces. Hazardous work will normally be defined in national legislation and will be likely to include most tasks in construction and several in agriculture.
- Assess the safety risks relating to any work by children under 18 and carry out regular monitoring of their health, working conditions and hours of work
- Ensure that any workers aged 13-15 are only doing light work outside school hours, in accordance with national legislation, or working in a government-approved training programme
- Ensure that contractors have adequate systems in place to check workers' ages, identify workers under the age of 18 and to ensure that they are not engaged in hazardous work, and that their work is subject to appropriate risk assessment and health monitoring

In addition, the Project will ensure that appropriate wages will be paid per assigned tasks. Security and safety standards will also be respected and enforced. In addition to the UNDP Stakeholder response mechanism, part of the Grievance Redress Mechanism will provide for a fair and free from influence entry point for their potential complaints and/or grievances. The Complaints Register and Grievance Redress Mechanism will provide an accessible, rapid, fair and effective response to concerned stakeholders, especially any vulnerable group who often lack access to formal legal regimes.

For any sub-contractors due diligence will be conducted as necessary to ascertain that third parties who engage project workers are legitimate and reliable entities and have in place appropriate policies, processes and systems that allow them to operate in accordance with the minimum requirements herein.

Additional guidance can be found in the [UNDP SES Guidance Note on Standard 7: Labour and Working Conditions](#).

3.4 Screening and assessment for demonstration sites in Outputs 3.1.1, 3.1.2 and 3.1.3

Various management plans including Pasture Management Plans (Output 3.1.1), Integrated Water-Land Management Plans (Output 3.1.2) and Forest Management Plans (Output 3.1.3) for the project demonstration areas will be individually screened with the SESP and based on these results and requirements of national EIA legislation, SESAs will be conducted, in order to identify, prevent and mitigate potential negative impacts on the critical habitats and/or the use of natural resources. These assessments would not result in an ESMP because the Water/Pastures/Forests and Land Use Plans would already encompass the necessary mitigation measures and would act as ESMPs (i.e. containing all elements required under the SES). The assessment will be conducted in line with national EIA procedures and UNDP SES.

The screening will need to ensure that no supported action:

- is detrimental to the conservation status of habitats and species, has measurable adverse impacts to critical habitats, or leads to a reduction in endangered species,
- increases the vulnerability of the forest ecosystem to the changing climatic conditions,
- leads to conversion of natural forests,
- introduces known invasive species.

3.5 Further screening

During implementation, the project will be re-screened with the UNDP SESP:

1. if new information/risks relevant to the SESP becomes available, e.g. through the completed SESAs, scoped ESAs and targeted assessments;
2. when determined necessary by the Project Manager (after consideration of the advice from PMU staff with responsibility for safeguards), the Project Board, or UNDP; and/or
3. when project circumstances change in a substantive or relevant way.

All activities that will be funded through the Agri-Environmental Payment Schemes (Output 3.1.1) and the project-supported grants (Output 3.1.4) will be screened using the SESP. As part of the screening, potential social and environmental risks of the activities will be identified and adequate risk mitigation measures introduced. The measures might include adjustments to the design of the activities, to avoid risks where necessary and appropriate (in line with the SES). Safeguards measures aligned with UNDP SES requirements will be included in the set of selection criteria, including exclusionary criteria to rule out Substantial/High risk projects, of the activities to be selected. The procedures will also ensure oversight, monitoring and reporting related to safeguards risks and implementation of agreed management measures. The safeguards procedures for approving funded-activities will be prepared during development of the payment schemes for Output 3.1.1 and selection criteria for project-support grants for Output 3.1.4.

3.6 Other relevant plans

Stakeholder Engagement Plan (SEP): Fair, inclusive and gender-responsive stakeholder engagement will be essential for final design of the project, ensuring equitable involvement and inclusion of women, men, youth and elderly people. The SEP will enable project officers to ensure that selection is carried out in synergy with the related legal and policy governance structure and that the implementation and selection procedures meet the required norms and standards. The plan will specifically consider how to engage marginalized and vulnerable groups equitably and meaningfully (women, women headed households, youth, elderly, rural poor, ethnic minorities and/or any other group deemed to be vulnerable) within the project areas. The plan will also provide terms of reference and modalities for managing stakeholder engagement in project activities at each site and with each community.

Gender Action Plan (GAP): The GAP was developed based on a gender analysis of the conservation and sustainable management of land resources factors and high value ecosystems in the Lake Sevan Basin region for multiple benefits. The purpose of the GAP is to promote the conservation and sustainable management of natural resources in the Lake Sevan Basin by reducing gender gaps identified in natural resource use and access to resources and services, as well as participation in natural resource management. Addressing gender gaps and inequalities is necessary for women in the project target regions of Armenia to live in a safe environment and enjoy equal rights and opportunities with men and achieve commensurate results. To achieve this goal, the GAP proposes gender sensitive activities to address the unequal access to and control over natural resources;

unbalanced participation and involvement in decision making in environmental planning and management at all levels and unequal access to socio-economic benefits and services. The gender plan includes targeted activities deployed with the aim of ensuring the equitable participation of women at three levels: as project beneficiaries, as active promoters of LDN/SLM measures and at decision making level. The gender activities will be implemented and supported by dedicated gender consultant and by the project team.

4 Institutional arrangements and capacity building

4.1 Roles and responsibilities for implementing this ESMF

The roles and responsibilities of project staff and associated agencies in the implementation of this ESMF is as follows. This ESMF does not cover the roles and responsibilities associated with implementation of the subsequent ESMPs and/or stand-alone management plans; those will be defined for each management plan that is developed in the project inception phase, as required per this ESMF.

The Implementing Partner: The MOE is the Implementing Partner through its Environmental Project Implementaiton Unit (EPIU). The Project will be nationally implemented (NIM) in line with the Standard Basic Assistance Agreement between the Government of Armenia and UNDP. The Implementing Partner is the entity to which the UNDP Administrator has entrusted the implementation of UNDP assistance, specified in this signed project document along with the assumption of full responsibility and accountability for the effective use of UNDP resources and the delivery of outputs, as set forth in this document.

The Implementing Partner is responsible for executing this project. Specific tasks include:

- Project planning, coordination, management, monitoring, evaluation and reporting. This includes providing all required information and data necessary for timely, comprehensive and evidence-based project reporting, including results and financial data, as necessary. The Implementing Partner will strive to ensure project-level M&E is undertaken by national institutes and is aligned with national systems so that the data used and generated by the project supports national systems,
- Risk management as outlined in the Project Document, SESP, ESMF, ESMP,
- Procurement of goods and services, including human resources,
- Financial management, including overseeing financial expenditures against project budgets,
- Approving and signing the multiyear workplan,
- Approving and signing the combined delivery report at the end of the year, and,
- Signing the financial report or the funding authorization and certificate of expenditures.

Responsible Party: The WWF Armenia was identified as the Responsible Party for the implementation of Component 2 (all Outputs) and Component 3 (Output 3.1.4.). WWF Armenia had been selected as a Responsible Party based on the results of the HACT and PCAT assessments, which are demonstrating that WWF Armenia has the capacity to implement projects and has a rich experience with biodiversity and PAs issues, local communities and advancement of sustainable agriculture practice in the PA, KBAs/IBAs proximity. The discussions held among the UNDP, Ministry of Environment and WWF Armenia had led to the conclusion that WWF Armenia is best capacitated to implement the Component 2 (PA and biodiversity) and select Outputs under Component 3 (proposed: Output 3.1.4) due to the complementarity with WWF Armenia "*Promotion of Eco-Corridors in the Southern Caucasus Phase I and II*" and experience in working with local communities and forging local partnerships and community endorsed eco-corridors. The following responsibilities will be included in the RP Agreements:

- Project planning, coordination, management, monitoring, evaluation, and reporting (relevant for assigned component of the project).
- Ensuring all requirements of UNDP's SES and national regulatory/policy frameworks and relevant international standards have been addressed (e.g. mitigation of identified adverse social and environmental impacts).
- Ensuring ESMF implementation and integration Human Rights based principles in the training modules, as relevant.

- Providing all required information and data necessary for timely, comprehensive, and evidence-based project reporting, including results and financial data, as necessary. This will include ensuring that project-level M&E is undertaken by national institutes and is aligned with national systems so that the data used and generated by the project, supports national systems.
- Risk management with respect to Social and Environmental Standards, as outlined in the ESMF (and as relevant for the assigned component).
- Procurement of goods and services, including human resources.
- Financial management, including overseeing financial expenditures against project budgets.
- Hold responsibility and accountability to UNDP for overall management of the project, including compliance with UNDP SES and national EIA legislation.

Project stakeholders and target groups: The participation and contribution of stakeholders and key target groups are critical for the success of the project, for stakeholders at both the national and local levels. The project applies participatory approaches to ensure government ownership and full stakeholder engagement under each project component. The Project Board or Steering Committee involves be constituted such as to ensure broad representation of all key interests throughout the project's implementation involving UNDP's long-standing partners such as the Ministry of Environment, Ministry of Economy, Ministry of Territorial Administration, Academy of Science and other partners. The project team will further establish and maintain the project partnerships. To secure their participation the stakeholders will be contacted and engaged with, using different strategies and methods that best suit their contributions and interests in the project.

UNDP: UNDP is accountable to the GEF for the implementation of this project. This includes oversight of project execution to ensure that the project is being carried out in accordance with agreed standards and provisions. UNDP is responsible for delivering GEF project cycle management services comprising project approval and start-up, project supervision and oversight, and project completion and evaluation. UNDP is also responsible for the Project Assurance role of the Project Board/Steering Committee. UNDP's role includes:

- Provision of oversight on all matters related to safeguards.
- Informing all the stakeholders and right-holders involved in, or potentially impacted, positively or negatively, by the GEF-financed projects, about the UNDP's corporate Accountability Mechanism (described below).
- Ensuring that the Compliance Review and the Stakeholder Response Mechanisms are operational during the lifetime of the projects.
- Ensuring adherence to the SES for project activities implemented using funds channelled through UNDP's accounts and undertake appropriate measures to address any shortcomings.
- Verifying and documenting that all UNDP SES requirements have been addressed.
- Providing technical guidance on implementation of this ESMF and administrative assistance in recruiting and contracting expert safeguards services (as required), and monitoring adherence of each project to the ESMF and UNDP policies and procedures.

Project Board: The Project Board (also called Project Steering Committee) is responsible for taking corrective action as needed to ensure the project achieves the desired results. In order to ensure UNDP's ultimate accountability, Project Board decisions should be made in accordance with standards that shall ensure management for development results, best value for money, fairness, integrity, transparency and effective international competition.

- Provide overall guidance and direction to the project, ensuring it remains within any specified constraints.
- Address project issues as raised by the Project Manager/Coordinator.
- Provide guidance on new project risks and agree on possible mitigation and management actions to address specific risks.
- Agree on Project Manager's tolerances as required, within the parameters set by UNDP-GEF, and provide direction and advice for exceptional situations when the Project Manager's tolerances are exceeded.

- Advise on major and minor amendments to the project within the parameters set by UNDP-GEF.
- Ensure coordination with various government agencies and their participation in project activities.
- Review combined delivery reports prior to certification by the implementing partner.
- Address project-level grievances.
- Review the final project report package during an end-of-project review meeting to discuss lessons learned and opportunities for scaling up/replication.
- Monitor implementation of this ESMF and compliance with national and international regulations, and UNDP social and environmental standards.
- Decision making for the adoption of necessary measures including full integration of management measures within project Outputs and annual work plans.
- Establish and support GRM mechanism to address any grievances.

Project Management Unit (PMU): Project management services including safeguards monitoring will be delivered by the Project Management Unit (PMU), hosted by EPIU under the Ministry of Environment mandate, and has the following responsibilities:

- Day-to-day management and decision-making for the project, including the mobilization of all project inputs, supervision over project staff, consultants and sub-contractors.
- Ensure that the project produces the results specified in the project document, to the required standard of quality and within the specified constraints of time and cost.
- Oversee implementation of environmental and social safeguards and SESP updates, raising awareness about project-level Grievance and Redress Mechanism (GRM).
- Assist in project planning, revisions and budget execution documents, contracting of national / local consultants and all project staff, contract monitoring in accordance with national legislation requirements and consistent with UNDP procedures (UNDP POPP).
- Provide technical support services on the project and monitoring of safeguards.

The relevant qualified project technical experts and the specialists with expertise in social and environmental safeguards will be engaged to support site specific screening and further appraisal as well as potential ad-hoc assessment needed for any undefined activity, and the subsequent development of any stand-alone management plans. These experts will offer an induction session for Project Management Units (and implementing partners, as needed) on safeguards responsibilities and approaches. An international consultant will be appointed on an as need basis to oversee the screening of the infrastructure works and undertake quality assurance for the SESAs, scoped ESAs, targeted assessments and site-specific ESMPs of detailed designs.

The UNDP-GEF Unit will provide advice to project teams as needed to support the implementation of this ESMF and the preparation, implementation and monitoring of social and environmental management plans/measures.

The Project Steering Committee will have the final responsibility for the integration of ESMF/ESMP/stand-alone management plan(s) in the execution of the project. Where necessary, capacity building and technical assistance activities will be included to enable proper implementation of the ESMP.

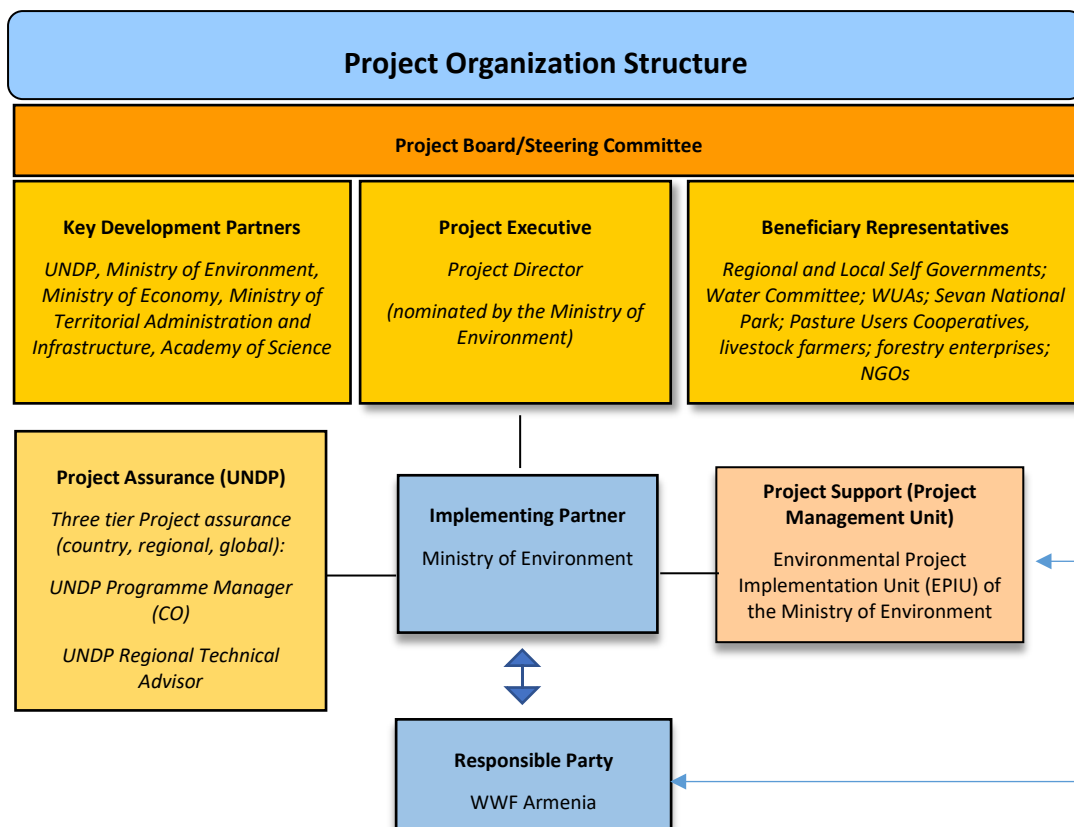


Figure 1: Project Organization Structure

4.2 Capacity Building

An international consultant with expertise in social and environmental safeguards will be engaged to support the completion of the SESAs, ESIA, targeted assessments and site-specific ESMPs which will be undertaken by external consultants. The international consultant will support UNDP staff on safeguards responsibilities and approaches.

During the inception phase, training on the ESMF and relevant SES requirements will be conducted targeting all national stakeholders, with focus on the public sector and local UNDP staff. In addition, the site-specific ESMPs will also identify capacity building activities to ensure sufficient capacities for implementation. This may include health, safety and pollution prevention training for workers and site supervisors and training of enforcement officials on human rights and UNDP SES.

During project implementation, UNDP will provide advice to project team members as needed to support the implementation of this ESMF, preparing the SESAs, ESIA and targeted assessments, site-specific ESMPs and pursuant measures. In line with their oversight role, UNDP will also review all safeguards instruments prepared for the project to ensure they are consistent with the SES.

5 Stakeholder engagement and information disclosure

Discussions with project stakeholders, including local communities at project sites, commenced during the project development phase. A list of the stakeholders that were engaged in these consultations has been Annexed to the Project Document (Annex 15: Stakeholders consulted during project development). The project also has an individual SEP (including a template for the Process Framework) and GAP, which is annexed to the Project Document (Annex 8: Stakeholders Engagement Plan and Annex 10: Gender Analysis and Gender Action Plan). These Plans will be followed to ensure that stakeholders are engaged in project implementation and particularly in the further assessment of social and environmental impacts and the development of appropriate management measures. The SEP will be updated during project implementation based on the assessments and

management plans conducted in line with this ESMF, as needed. Potentially affected stakeholders will be engaged during the implementation of this ESMF.

As part of the stakeholder engagement process, UNDP's SES require that project stakeholders have access to relevant information. Specifically, the SES (SES, Policy Delivery Process) stipulates that, among other disclosures specified by UNDP's policies and procedures, UNDP will ensure that the following information be made available:

- Stakeholder engagement plans and summary reports of stakeholder consultations
- Social and environmental screening reports with project documentation
- Draft social and environmental assessments, including any draft management plans
- Final social and environmental assessments and associated management plans
- Any required social and environmental monitoring reports.

As outlined in the SES, the type and timing of assessments and management plans vary depending on the level of social and environmental risk associated with a project as well as timing of the social and environmental assessment.

This ESMF (and the project SESP) will be disclosed via the UNDP website in accordance with UNDP SES policy. The subsequent project ESMPs or stand-alone management plan(s) will also be publicly disclosed via the UNDP website once drafted and finalized and adopted only after the required time period for disclosure has elapsed.

These requirements for stakeholder engagement and disclosure will be adhered to during the implementation of this ESMF, and the subsequent implementation of the resulting ESMPs and any stand-alone management plans.

6 Accountability and Grievance Redress Mechanisms

6.1 UNDP's Accountability Mechanisms

UNDP's SES recognize that even with strong planning and stakeholder engagement, unanticipated issues can still arise. Therefore, the SES are underpinned by an Accountability Mechanism with two key components:

1. A Social and Environmental Compliance Review Unit (SECU) to respond to claims that UNDP is not in compliance with applicable environmental and social policies; and
2. A Stakeholder Response Mechanism (SRM) that ensures individuals, peoples, and communities affected by projects have access to appropriate grievance resolution procedures for hearing and addressing project-related complaints and disputes.

UNDP's Accountability Mechanism is available to all of UNDP's project stakeholders.

The Social and Environmental Compliance Unit (SECU) investigates concerns about non-compliance with UNDP's Social and Environmental Standards and Screening Procedure raised by project-affected stakeholders and recommends measures to address findings of non-compliance.

The Stakeholder Response Mechanism helps project-affected stakeholders, UNDP's partners (governments, NGOs, businesses) and others jointly address grievances or disputes related to the social and/or environmental impacts of UNDP-supported projects.

Further information, including how to submit a request to SECU or SRM, is found on the UNDP website at: <http://www.undp.org/content/undp/en/home/operations/accountability/secu-srm/>

6.2 Project-level Grievance Redress Mechanisms

The Implementing Partner will establish and implement, as described in the Project Document, a transparent, fair, and free-to-access project-level Grievance Redress Mechanism (GRM), approved by stakeholders, which will be put in place at the start of implementation. Interested stakeholders may raise a grievance at any time to the Project Management Office, the Executing Agency, Implementing Agency (UNDP), or the GEF.

The mandate of the GRM will be to:

- (i) receive and address any concerns, complaints, notices of emerging conflicts, or grievances (collectively “*Grievance*”) alleging actual or potential harm to affected person(s) (the “*Claimant(s)*”) arising from Project.
- (ii) assist in resolution of Grievances between and among Project Stakeholders; as well as the various government ministries, agencies, and commissions, CSOs and NGOs, and others (collectively, the “*Stakeholders*”) in the context of the Project.
- (iii) Conduct itself at all times in a flexible, collaborative, and transparent manner aimed at problem solving and consensus building.

The functions of the GRM will be to:

- (i) Receive, Log and Track all Grievances received.
- (ii) Provide regular status updates on Grievances to Claimants, Project Board (PB) members and other relevant Stakeholders, as applicable.
- (iii) Engage the PB members, Government institutions and other relevant Stakeholders in Grievance resolution.
- (iv) Process and propose solutions and ways forward related to specific Grievances *within a period not to exceed sixty (60) days* from receipt of the Grievance.
- (v) Identify growing trends in Grievances and recommend possible measures to avoid the same.
- (vi) Receive and service requests for, and suggest the use of, mediation or facilitation.
- (vii) Elaborate bi-annual reports, make said reports available to the public, and more generally work to maximize the disclosure of its work (including its reports, findings, and outcomes).
- (viii) Ensure increased awareness, accessibility, predictability, transparency, legitimacy, and credibility of the GRM process.
- (ix) Collaborate with Partner Institutions and other NGOs, CSOs and other entities to conduct outreach initiatives to increase awareness among Stakeholders as to the existence of the GRM and how its services can be accessed.
- (x) Ensure continuing education of PB members and their respective institutions about the relevant laws and policies that they will need to be aware of to participate in the development of effective resolutions to Grievances likely to come before the GRM.
- (xi) Monitor follow up to Grievance resolutions, as appropriate.

Further details regarding requirements for the GRM are included in Terms of Reference for developing a Grievance Redress Mechanism, in Annex 9.6.

7 Budget for ESMF Implementation

Funding for implementation of the ESMF is included in the Project budget. The estimated costs are indicated below. Costs associated with the time of Project Management Unit coordinating the development and implementation of this ESMF and UNDP CO support are not shown.

Table 2: Breakdown of project level costs for ESMF implementation

Description	Cost, USD
Carrying out SESAs, ESIAAs and targeted assessments	
National SES expert (significant semi-permanent engagement for the entire project duration)	20,000
International SES expert (backstopping support as/when needed, includes travel as needed)	20,000
National consultants for SESAs for the ISLUPs	20,000
National consultants for ESIAAs or targeted assessments for infrastructure works	10,000
Gender expert	6,000
Printed reports	4,000
TOTAL:	80,000

8 Monitoring and evaluation arrangements

Reporting on progress and issues in the implementation of this ESMF will be documented in the project quarterly reports and annual project implementation reports (PIRs). Until the ESMPs and stand-alone management plans are put in place, UNDP CO will be responsible for compiling reports on the implementation of this ESMF, for reporting to the Project Board/Local Coordination Committees. Key issues will be presented to the Project Board during each committee meeting.

Implementation of the site-specific ESMPs and stand-alone management plans will be the responsibility for the individual project management teams, and other partners as agreed upon and described in those future plans.

The ESMF monitoring and evaluation plan is outlined below in Table 6.

Table 3: ESMF M&E plan and estimated budget

Monitoring Activity & Relevant Projects	Description	Frequency / Timeframe	Expected Action	Roles and Responsibilities	Cost (per project, excl. staff time)
Track progress of ESMF implementation	Implementation of this ESMF coordinated for each project, and with results reported to each Project Board meeting (Project Board meets at least 2 times a year)	Quarterly (until ESMPs and management plans are in place)	Required ESMF steps are completed in a timely manner.	Project Manager with support from the Project UNDP Administrative and Financial Associate	None
SESAs for ISLUPs and targeted screening and assessments of various “downstream” activities and development of reports and management plans. Development of site-specific ESMP IF needed.	Carried out in a participatory manner, in-depth analysis of potential social and environmental impacts, as well as identification / validation of mitigation measures, drafted in participatory manner	Years 1-3 of the project implementation	Risks and potential impacts are assessed with support of consultants and participation of project team and stakeholders; management actions identified and incorporated into project implementation strategies.	service providers with guidance from UNDP, Project Manager, Task Leaders, Project Specialists, Gender and Project UNDP Administrative/Financial Associate.	USD 20,000
Implementation of mitigation measures and monitoring of potential impacts identified in ESIA or targeted assessment(s)/ESMPs (If determined necessary by the site screenings using SESP)	Permanent and participatory implementation and monitoring of impacts and mitigation measures, in accordance with ESMP (to be prepared together with targeted assessment)	Continuous, once (potential) targeted assessments are completed and ESMPs are in place	Implementation of ESMP; participatory monitoring of ESIA or targeted assessment findings (i.e. identifying indicators, monitoring potential impacts and risks); integration of ESMP into project implementation strategies.	UNDP CO and RP/IP Project Manager Task Leaders, UNDP Administrative and Financial Associate oversight by UNDP CO, Project Board	TBD, based on site screenings
Implementation of Process Framework	Carried out in a participatory manner, targeted analysis of potential livelihood impacts establishment/ enhanced management, as well as identification / validation of mitigation measures, drafted in participatory manner	Years 1-3 of the project implementation	Potential impacts related to economic displacement around PAs are assessed with support of consultants and participation of project team and stakeholders, plans undergoing Process Framework include provisions and means, including financial, for potential compensation at full replacement costs and other assistance, for the displaced people.	With guidance from UNDP Project Manager Task Leaders UNDP Administrative and Financial Associate	TBD, based on site screenings
Implementation of management measures and monitoring of potential impacts identified in ESIA or targeted assessment	Permanent and participatory implementation and monitoring of management measures, in accordance with findings of ESIA or targeted assessment	Continuous, once assessment is complete and	Implementation of ESMPs; participatory monitoring; integration of management plans into project implementation strategies	Project Manager oversight by UNDP CO, Project Board/Local Project Coordination Committees	TBD, based on assessment

Monitoring Activity & Relevant Projects	Description	Frequency / Timeframe	Expected Action	Roles and Responsibilities	Cost (per project, excl. staff time)
		management plan is in place		Task Leaders Local support experts	
Learning	Knowledge, good practices, and lessons learned regarding social and environmental risk management will be captured regularly, as well as actively sourced from other projects and partners and integrated back into the project.	At least annually	Relevant lessons are captured by the project teams and used to inform management decisions.	Project Manager Communication Specialist	None
Annual project quality assurance	The quality of the project will be assessed against UNDP's quality standards to identify project strengths and weaknesses and to inform management decision making to improve the project	Annually	Areas of strength and weakness will be reviewed and used to inform decisions to improve project performance	UNDP CO, with support from Project Manager and UNDP Administrative and Financial Associate	None
Review and make course corrections	Internal review of data and evidence from all monitoring actions to inform decision making	At least annually	Performance data, risks, lessons, and quality will be discussed by the project steering committee and used to make course corrections	Project Board	None
Annual project implementation reports	As part of progress report to be presented to the Project Steering Committee and key stakeholders, analysis, updating and recommendations for risk management will be included	Annually	Updates on progress of ESMF will be reported in the project's annual PIRs. A summary of the avoidance and mitigation of potential social and environmental impacts will be included in the program annual report, sharing best practices and lessons learned across the program.	UNDP CO, UNDP-GEF RTA, Project Manager	None
Project review	The Project Board will consider updated analysis of risks and recommended risk mitigation measures at all meetings	Twice annually	Any risks and/ or impacts that are not adequately addressed by national mechanisms or project team will be discussed in Project Board meetings. Recommendations will be made, discussed, and agreed upon.	Project Board, Project Manager	None

9 Annexes

9.1 SESP Template

(please see Annex 5, UNDP/GEF Project Document)

9.2 Process Framework Template

A Process Framework is prepared when UNDP-supported projects may cause restrictions in access to natural resources in legally designated parks and protected areas. The purpose of the process framework is to establish a process by which members of potentially affected communities participate in the design of project components, determination of measures necessary to address the requirements of SES Standard 5, and implementation and monitoring of relevant project activities.

The level of detail of the Process Framework may vary depending on project activities, characteristics of restrictions and their impacts, and the number of persons affected. The Process Framework supplements the project's environmental and social assessment with a participatory framework focused on the potential impacts of access restrictions.

Specifically, the Process Framework should include the following elements:

1. *Project background*: Briefly describe the project and components or activities that may involve new or more stringent restrictions on natural resource use.
2. *Participatory implementation*: Describe the process by which potentially displaced persons will participate in determining potential access restrictions, mutually acceptable levels of resource use, management arrangements, and measures to address impacts on affected communities. The roles and responsibilities of stakeholders and the methods of participation and decision-making should be described; decision-making may include the establishment of representative local structures, the use of open meetings, and involvement of existing local institutions, being sure that marginalized/vulnerable groups (such as women and youth) are able to participate in decision-making processes. Methods of consultation and participation should be in a form appropriate for affected communities.
3. *Potential impacts*: Describe the process by which potentially affected communities will be involved in identifying any adverse environmental and social impacts associated with project activities, including:
 - the types and extent of community use (and use by men and women) of natural resources in relevant areas, and the existing rules and institutions for the use and management of natural resources, including customary use rights.
 - the threats to and impacts on the relevant areas from various activities in the area of local communities and other stakeholders (e.g. external poachers and traders, development activities);
 - the potential livelihood impacts on men and women of new or more strictly enforced restrictions on use of resources in the area.
4. *Eligibility criteria*: The eligibility criteria would determine which groups and persons are eligible for assistance and mitigation measures while discouraging ineligible persons, such as opportunistic settlers, from claiming benefits. That is, the criteria may exclude certain affected persons or groups from assistance because their activities are clearly illegal, unsustainable and destructive (e.g., wildlife poachers, dynamite fishers). The criteria may also distinguish between persons utilizing resources unsustainably and opportunistically, and others using resources for their livelihoods, and between groups with customary rights and non-residents or immigrants. The criteria need to account for variations in seasonal use of lands by local communities and pastoralists. The eligibility criteria should also establish a cut-off date.
5. *Measures to assist affected persons to improve their livelihoods*: Describe methods and procedures by which communities will identify and choose potential mitigating or compensating measures to be provided to those adversely affected, and procedures by which adversely affected community members will decide among the options available to them. The measures will seek to improve livelihoods in real terms to pre-displacement levels, while maintaining the sustainability of the park or protected area. However, in some circumstances affected communities may agree to restrictions without identifying one-for-one mitigation measures as they may see the long-term benefits of improved natural resource management and conservation. Possible measures may include:
 - special measures for recognition and support of customary rights to land and natural resources
 - transparent, equitable, and fair ways of more sustainable sharing of the resources
 - access to alternative resources or functional substitutes
 - alternative livelihood and income-generating activities
 - health and education benefits

- obtaining employment, for example as park rangers or eco-tourist guides, as well as in wider project functions, such as stakeholder engagement, technical advising or monitoring and evaluation
 - technical assistance to improve land and natural resource use, and marketing of sustainable products and commodities.
6. *Conflict resolution and grievance mechanism:* Describe the process for resolving disputes relating to resource use restrictions that may arise between or among affected communities, and grievances that may arise from members of communities who are dissatisfied with the eligibility criteria, community planning measures, or actual implementation. Procedures should take into account local dispute resolution practices and institutions.
 7. *Implementation and monitoring arrangements:* Describe the implementation arrangements, including activity timetable and the roles and responsibilities of different stakeholders, such as the implementing partner, affected communities, and relevant government agencies. Provide clear delineation for administrative and financial responsibilities under the project. Describe arrangements for participatory monitoring of project activities and the effectiveness of measures taken that seek to improve incomes, livelihoods and living standards.
 8. *Costs and budget:* An appropriately costed plan, with itemized budget sufficient to satisfactorily undertake the activities described, including financing for livelihood enhancement measures, participatory processes, implementation and monitoring arrangements. List sources and flow of funds.

9.3 Indicative Outline of Environmental and Social Impact Assessment (ESIA)

Generic TOR for ESIA (UNDP, 2016b, pp. 33-34)

An ESIA report should include the following major elements (not necessarily in the following order):

(1) Executive summary: Concisely discusses significant findings and recommended actions.

(2) Legal and institutional framework: Summarizes the analysis of the legal and institutional framework for the project, within which the social and environmental assessment is carried out, including (a) the country's applicable policy framework, national laws and regulations, and institutional capabilities (including implementation) relating to social and environmental issues; obligations of the country directly applicable to the project under relevant international treaties and agreements; (b) applicable requirements under UNDP's SES; and (c) and other relevant social and environmental standards and/or requirements, including those of any other donors and development partners. Compares the existing social and environmental framework and applicable requirements of UNDP's SES (and those of other donors/development partners) and identifies any potential gaps that will need to be addressed.

(3) Project description: Concisely describes the proposed project and its geographic, social, environmental, and temporal context, including any offsite activities that may be required (e.g., dedicated pipelines, access roads, power supply, water supply, housing, and raw material and product storage facilities), as well as the project's primary supply chain. Includes a map of sufficient detail, showing the project site and the area that may be affected by the project's direct, indirect, and cumulative impacts. (i.e. area of influence).

(4) Baseline data: Summarizes the baseline data that is relevant to decisions about project location, design, operation, or mitigation measures; identifies and estimates the extent and quality of available data, key data gaps, and uncertainties associated with predictions; assesses the scope of the area to be studied and describes relevant physical, biological, and socioeconomic conditions, including any changes anticipated before the project commences; and takes into account current and proposed development activities within the project area but not directly connected to the project.

(5) Social and environmental risks and impacts: Predicts and takes into account all relevant social and environmental risks and impacts of the project, including those related to UNDP's SES (Overarching Policy and Principles and Project-level Standards). These will include, but are not limited to, the following:

(a) Environmental risks and impacts, including: any material threat to the protection, conservation, maintenance and rehabilitation of natural habitats, biodiversity, and ecosystems; those related to climate change and other transboundary or global impacts; those related to community health and safety; those related to pollution and discharges of waste; those related to the use of living natural resources, such as fisheries and forests; and those related to other applicable standards.³

(b) Social risks and impacts, including: any project-related threats to human rights of affected communities and individuals; threats to human security through the escalation of personal, communal or inter-state conflict, crime or violence; risks of gender discrimination; risks that adverse project impacts fall disproportionately on disadvantaged or marginalized groups; any prejudice or discrimination toward individuals or groups in providing access to development resources and project benefits, particularly in the case of disadvantaged or marginalized groups; negative economic and social impacts relating to physical displacement (i.e. relocation or loss of shelter) or economic displacement (i.e. loss of assets or access to assets that leads to loss of income sources or means of livelihood) as a result of project-related land or resource acquisition or restrictions on land use or access to resources; impacts on the health, safety and well-being of workers and project-affected communities; and risks to cultural heritage.

(6) Analysis of alternatives: systematically compares feasible alternatives to the proposed project site, technology, design, and operation – including the "without project" situation – in terms of their potential social and environmental impacts; assesses the alternatives' feasibility of mitigating the adverse social and environmental impacts; the capital and recurrent costs of alternative mitigation measures, and their suitability

³ For example, the Environmental, Health, and Safety Guidelines (EHSGs), which are technical reference documents with general and industry-specific statements of Good International Industry Practice. The EHSGs contain information on industry-specific risks and impacts and the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable cost. Available at www.ifc.org/ehsguidelines.

under local conditions; the institutional, training, and monitoring requirements for the alternative mitigation measures; for each of the alternatives, quantifies the social and environmental impacts to the extent possible, and attaches economic values where feasible. Sets out the basis for selecting the particular project design.

(7) Mitigation Measures: Inclusion or summary of (with attachment of full) Environmental and Social Management Plan (ESMP) (see indicative outline of ESMP below.) The ESMP identifies mitigation measures required to address identified social and environmental risks and impacts, as well as measures related to monitoring, capacity development, stakeholder engagement, and implementation action plan.

(8) Stakeholders. Summarizes and links to project Stakeholder Engagement Plan or ESMP that includes plan for consultations. Includes summary of consultations undertaken for development of ESIA (see appendices).

(9) Conclusions and Recommendations: Succinctly describes conclusion drawn from the assessment and provides recommendations. Includes recommendation regarding the project's anticipated benefits in relation to its social and environmental risks and impacts.

(9) Appendices: (i) List of the individuals or organisations that prepared or contributed to the social and environmental assessment; (ii) References – setting out the written materials both published and unpublished, that have been used; (iii) Record of meetings, consultations and surveys with stakeholders, including those with affected people and local NGOs. The record specifies the means of such stakeholder engagement that were used to obtain the views of affected groups and local NGOs, summarizes key concerns and how these concerns addressed in project design and mitigation measures; (iv) Tables presenting the relevant data referred to or summarized in the main text; (v) Attachment of any other mitigation plans; (vi) List of associated reports or plans. the main text; (v) Attachment of any other mitigation plans; (vi) List of associated reports or plans.

9.4 Indicative outline of Environmental and Social Management Plan (ESMP)

An ESMP may be prepared as part of the Environmental and Social Impact Assessment (ESIA) report or as a stand-alone document.⁴ The content of the ESMP should address the following sections:

(1) Mitigation: Identifies measures and actions in accordance with the mitigation hierarchy that avoid, or if avoidance not possible, reduce potentially significant adverse social and environmental impacts to acceptable levels. Specifically, the ESMP: (a) identifies and summarizes all anticipated significant adverse social and environmental impacts; (b) describes – with technical details – each mitigation measure, including the type of impact to which it relates and the conditions under which it is required (e.g., continuously or in the event of contingencies), together with designs, equipment descriptions, and operating procedures, as appropriate; (c) estimates any potential social and environmental impacts of these measures and any residual impacts following mitigation; and (d) takes into account, and is consistent with, other required mitigation plans (e.g. for displacement, indigenous peoples).

(2) Monitoring: Identifies monitoring objectives and specifies the type of monitoring, with linkages to the impacts assessed in the environmental and social assessment and the mitigation measures described in the ESMP. Specifically, the monitoring section of the ESMP provides (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.

(3) Capacity development and training: To support timely and effective implementation of social and environmental project components and mitigation measures, the ESMP draws on the environmental and social assessment of the existence, role, and capability of responsible parties on site or at the agency and ministry level. Specifically, the ESMP provides a description of institutional arrangements, identifying which party is responsible for carrying out the mitigation and monitoring measures (e.g. for operation, supervision, enforcement, monitoring of implementation, remedial action, financing, reporting, and staff training). Where support for strengthening social and environmental management capability is identified, ESMP recommends the establishment or expansion of the parties responsible, the training of staff and any additional measures that may be necessary to support implementation of mitigation measures and any other recommendations of the environmental and social assessment.

(4) Stakeholder Engagement: Summarizes and links to project Stakeholder Engagement Plan or outlines plan to engage in meaningful, effective and informed consultations with affected stakeholders. Includes information on (a) means used to inform and involve affected people in the assessment process; and (b) summary of stakeholder engagement plan for meaningful, effective consultations during project implementation, including identification of milestones for consultations, information disclosure, and periodic reporting on progress on project implementation. Require documentation of consultations (summaries including presentations, key points raised and responses provided, participation lists). Include information on project grievance mechanism (below) and on UNDP Accountability Mechanisms (SRM, SECU).

(5) Grievance redress mechanism: Describes effective processes for receiving and addressing stakeholder concerns and grievances regarding the project's social and environmental performance.

Describe mechanisms to provide stakeholders and potential affected communities avenues to provide feedback or grievances, and receive responses, regarding the implementation of specific activities, policies, or regulations.

(6) Implementation action plan (schedule and cost estimates): For all four above aspects (mitigation, monitoring, capacity development, and stakeholder engagement), ESMP provides (a) an implementation schedule for measures that must be carried out as part of the project, showing phasing and coordination with overall project implementation plans; and (b) the capital and recurrent cost estimates and sources of funds for implementing the ESMP. These figures are also integrated into the total project cost tables. Each of the measures and actions

⁴ This may be particularly relevant where contractors are being engaged to carry out the project, or parts thereof, and the ESMP sets out the requirements to be followed by contractors. In this case the ESMP should be incorporated **as part of the contract with the contractor**, together with appropriate monitoring and enforcement provisions.

to be implemented will be clearly specified and the costs of so doing will be integrated into the project's overall planning, design, budget, and implementation.

9.5 Labour Management Procedures Template

The Labour Management Procedures (LMP) facilitates planning and assists responsible parties to ensure that project implementation adheres to the requirements of SES Standard 7 on Labour and Working Conditions. The LMP (a) sets out the written labour procedures for the project, (b) identifies the main labour requirements and risks associated with the project, and (c) helps the project developer to determine the resources necessary to address project labour issues and risks and sets out an action plan.

The LMP summarizes key labour-related risks and issues and may be supplemented by more targeted analyses and plans (e.g. such as an occupational safety and health action plan, WBG EHS sector specific guidelines, ISO standards, contractor management matrices, etc.). The LMP (as with supporting analyses) should be undertaken by experts with relevant expertise.

The LMP may be prepared as a stand-alone document, or form part of other environmental and social management documents. The LMP is a living document, which is initiated early in project preparation, and is reviewed and updated throughout development and implementation of the project.

In preparing and updating the LMP, project developers should refer to the requirements of national law and S7 and its Guidance Note. The content of the LMP is indicative: some issues may not be relevant to the project while some projects may have other issues that need to be captured from a planning perspective. Where national law addresses requirements of S7 this should be noted in the LMP.

Where project workers under a single project may be engaged under significantly different circumstances (e.g. different regions of a country, different employment arrangements), it may be necessary to ensure that these differences are appropriately addressed in the LMP, or separate LMPs may need to be developed.

For projects utilizing an ESMF given that specific activities and/or subprojects have yet to be defined, the development of the LMP may need to be deferred. The ESMF should address as many potential issues outlined in the LMP as is feasible during project development, and the ESMF should include procedures for undertaking a specific LMP once locations and activities are defined.

A concise and up to date LMP will enable different project-related parties, for example, staff of the project implementing unit, contractors and sub-contractors and project workers, to have a clear understanding of what is required on a specific labour issue. The level of detail contained in the LMP will depend on the type of project and information available. Where relevant information is not available, this should be noted and the LMP should be updated as soon as possible.

Below is an indicative outline of the LMP.

-
1. **Overview of Labour Use in the Project:** This section describes the following, based on available information:
 - a. *Number of Project Workers:* The total number of workers to be employed on the project, and the different types of workers: direct workers, contracted workers, temporary or seasonal workers and community workers. Where numbers are not yet firm, an estimate should be provided.
 - b. *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.
 - c. *Timing of Labour Requirements:* The timing and sequencing of the project's labour requirements in terms of numbers, locations, types of jobs and skills required.
 - d. *Contracted Workers:* The anticipated or known contracting structure for the project, with numbers and types of contractors/subcontractors and the likely number of project workers to be employed or engaged by each contractor/subcontractor. If it is likely that project workers will be engaged through brokers, intermediaries or agents, this should be noted together with an estimate of the number of workers that are expected to be recruited in this way.
 - e. *Migrant Workers:* If it is likely that migrant workers (either domestic or international) are expected to work on the project, this should be noted and details provided.
 2. **Assessment of Key Potential Labour Risks:** This section describes the following, based on available information:

- a. *Project activities*: The type and location of the project, and the different activities the project workers will carry out, including primary supplier(s)
- b. *Key Labour Risks*: The key labour risks that may be associated with the project (see, for example, those identified in S7 and the GN). These could 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 labour or forced labour, with reference to the sector or locality
 - discriminatory policies or practices that deny equal opportunity
 - restrictions on freedom of association and collective bargaining
 - likely presence of migrants or seasonal workers
 - risks of labour 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

3. Brief overview of labour legislation, agreements and potential gaps with Standard 7:

- **Core Labour Standards**: This section sets out the key aspects of national legislation implementing the ILO fundamental rights at work, i.e. prohibition of child labour/minimum working age; prohibition of forced labour, non-discrimination/equal opportunity; and freedom of association and collective bargaining. The overview should highlight any material gaps between national law and S7.9-19.
- **Terms and Conditions**: This section sets out the *key aspects* of national labour legislation with regards to term and conditions of work, and how national legislation applies to different categories of workers identified in Section 1. The overview focuses on legislation which relates to the items set out in S7, paras.5-8 (i.e. wages, deductions and benefits) and any material gaps with S7. The section should also identify the terms of any existing collective agreements that stipulate workplace terms and conditions.
- **Occupational Safety and Health (OSH)**: This section sets out the *key aspects* of the national labour legislation with regards to occupational health and safety, and how national legislation applies to the different categories of workers identified in Section 1. The overview focuses on legislation that relates to the items set out in S7, paras. 20-25 and any material gaps with S7.

4. Responsible Staff: This section identifies the functions and/or individuals within the project responsible for (as relevant):

- engagement and management of project workers
- engagement and management of contractors/subcontractors
- occupational safety and health (OSH)
- training of workers
- addressing worker grievances

In some cases, this section will identify functions and/or individuals from contractors or subcontractors, particularly in projects where project workers are employed by third parties.

5. Policies and Procedures: This section sets out:

- **Management systems**: Relevant management systems *in place* to implement S7, e.g. human resources policy, anti-harassment policy, staff handbook, grievance procedure, OSH management system, etc. These can be referenced or annexed to the LMP, together with any other supporting documentation. Where relevant, it identifies applicable national legislation.
- **Age of Employment**: Details regarding (see S7 paras. 16-19 and GN):
 - the minimum age for employment on the project
 - the process that will be followed to verify the age of project workers
 - the procedure that will be followed if underage workers are found working on the project
 - the procedure for conducting risk assessments for workers aged between the minimum age and 18
 - Where incidences of **child labour** are identified, describe how these will be remediated
- **Forced Labour**: Where the risk of forced labour has been identified, this section outlines how this risk will be mitigated, and how any instances of forced labour will be addressed (see S7 para. 14)

- and GN).
- **Occupational safety and health:** Where significant health and safety risks have been identified, summarize how these will be addressed in a manner consistent with national labour and employment regulations and the requirements of S7. (Note that a specific OSH plan may be necessary.)
 - **Terms and Conditions:** This section sets out details regarding (see S7 paras. 5-8):
 - specific wages, hours and other provisions that apply to the project
 - maximum number of hours that can be worked on the project
 - any collective agreements that apply to the project. When relevant, provide a list of agreements and describe key features and provisions
 - other specific terms and conditions (e.g. benefits)
 - “Beyond compliance” initiatives e.g. to promote local employment or the hiring of traditionally underrepresented groups
 - **Grievance Mechanism:** This section sets out details of the grievance mechanism that will be provided for direct and contracted workers, and describes the way in which these workers will be made aware of the mechanism (S7, paras. 26-28).
 - **Contractor Management:** This section sets out details regarding (see S7, paras. 29-31 and GN):
 - the selection process for contractors/third parties
 - the contractual provisions that will be put in place relating to contractors for the management of labour issues, including OSH
 - the procedure for managing and monitoring the performance of contractors
 - **Community Workers:** Where community workers will be involved in the project, this section sets out details of the terms and conditions of work, and identifies measures to check that community labour is provided on a voluntary basis. It also provides details of the type of agreements that are required and how they will be documented. This section sets out details of the grievance mechanism for community workers and the roles and responsibilities for monitoring such workers.
 - **Primary Supply Workers:** Where a significant risk of violations of core labour standards³² or serious safety issues in relation to primary suppliers has been identified, this section sets out the procedure for monitoring and reporting on primary supply workers (S7 paras. 32-34)
6. **Action Plan** This section sets out details of actions required to achieve and maintain compliance with national law and S7, including responsibilities, timelines and cost/resource estimates. The Plan will also include monitoring and reporting requirements appropriate to the nature of the project and associated labour risks and impacts. The Action Plan includes the following elements:
- Summary of required measures identified in above sections of the LMP.
 - Describe schedule, institutional arrangements, and responsibilities and mechanisms for carrying out the identified measures, indicating who is responsible and when actions will be undertaken.
 - Describe the monitoring framework for the project and key indicators for measuring progress in implementing the identified measures.
 - Budget and Financing: Include an appropriately costed plan, with itemized budget sufficient to satisfactorily undertake the identified measures.

³² Child labour, forced labour, non-discrimination and equal opportunity, freedom of association and collective bargaining.

9.6 Sample Terms of Reference: Project-level Grievance Redress Mechanism

Source: Guidance Note on Stakeholder Engagement, UNDP Social and Environmental Standards (SES), October 2017

I. Mandate

The mandate of the GRM will be to:

- i. Receive and address any concerns, complaints, notices of emerging conflicts, or grievances (collectively “Grievance”) alleging actual or potential harm to affected person(s) (the “Claimant(s)”) arising from Project.
- ii. Assist in resolution of Grievances between and among Project Stakeholders; as well as the various government ministries, agencies, and commissions, CSOs and NGOs, and others (collectively, the “Stakeholders”) in the context of the Project.
- iii. Conduct itself at all times in a flexible, collaborative, and transparent manner aimed at problem solving and consensus building.

II. Functions

The functions of the GRM will be to:

- i. Receive, Log and Track all Grievances received.
- ii. Provide regular status updates on Grievances to Claimants, Project Board (PB) members and other relevant Stakeholders, as applicable.
- iii. Engage the PB members, Government institutions and other relevant Stakeholders in Grievance resolution.
- iv. Process and propose solutions and ways forward related to specific Grievances within a period not to exceed sixty (60) days from receipt of the Grievance.
- v. Identify growing trends in Grievances and recommend possible measures to avoid the same.
- vi. Receive and service requests for, and suggest the use of, mediation or facilitation.
- vii. Elaborate bi-annual reports, make said reports available to the public, and more generally work to maximize the disclosure of its work (including its reports, findings, and outcomes).
- viii. Ensure increased awareness, accessibility, predictability, transparency, legitimacy, and credibility of the GRM process.
- ix. Collaborate with Partner Institutions and other NGOs, CSOs and other entities to conduct outreach initiatives to increase awareness among Stakeholders as to the existence of the GRM and how its services can be accessed.
- x. Ensure continuing education of PB members and their respective institutions about the relevant laws and policies that they will need to be aware of to participate in the development of effective resolutions to Grievances likely to come before the GRM.
- xi. Monitor follow up to Grievance resolutions, as appropriate.

III. Composition

The GRM will be composed of:

[Name of Implementing Partner] as the Secretariat and either:

- (a) A standing GRM Sub-Committee [made up of x, y, z PB members],

and/or

- (b) Ad hoc GRM Task Teams in response to specific requests for grievance.

The GRM Sub-Committee will be balanced in composition (government and non-government) and should not include any PB members with a direct interest or role in the grievance/dispute.

IV. [Name of Implementing Partner]

In its role as GRM Secretariat, [Name of Implementing Partner] will perform the following core functions:

- Publicize the existence of the GRM and the procedure for using it.
- Receive and log requests for dispute resolution.
- Acknowledge receipt to the requestor.
- Determine eligibility.
- Forward eligible requests to the PB for review and action.
- Track and document efforts at grievance/dispute resolution and their outcomes.

V. Project Board/GRM Sub-Committee/GRM Task Team

The Project Board/GRM Sub-Committee and/or GRM Task Team will perform the following core functions:

- Take direct action to resolve the grievance/dispute (e.g. bring the relevant parties together to discuss and resolve the issue themselves with oversight by the PB).
- Request further information to clarify the issue, and share that information with all relevant parties, or ensure that a government agency represented on the PB took an appropriate administrative action to deal with a complaint.
- Refer the grievance/dispute to independent mediation, while maintaining oversight; or
- Determine that the request was outside the scope and mandate of the PB and refer it elsewhere (e.g. Ministry of Justice and Police or to the courts).

VI. Communicating a Grievance

(i) Who can Submit a Grievance?

A Grievance can be sent by any individual or group of individuals that believes it has been or will be harmed by the Project.

If a Grievance is to be lodged by a different individual or organization on behalf of those said to be affected, the Claimant must identify the individual and/or people on behalf of who the Grievance is submitted and provide written confirmation by the individual and/or people represented that they are giving the Claimant the authority to present the Grievance on their behalf. The GRM will take reasonable steps to verify this authority.

(ii) How is the Grievance Communicated?

The GRM shall maintain a flexible approach with respect to receiving Grievances in light of known local constraints with respect to communications and access to resources for some Stakeholders. A Grievance can be transmitted to the GRM by any means available (i.e. by email, letter, phone call, meeting, SMS, etc.). The contact information is the following:

[Implementing Partner to add address, phone number, fax, etc.]

To facilitate communications with and between the GRM and potential Claimants, the GRM will receive support from the PB members' institutions, local government, and civil society organizations

(iii) What information should be included in a Grievance?

The Grievance should include the following information:

- (a) the name of the individual or individuals making the Complaint (the "Claimant").
- (b) a means for contacting the Claimant (email, phone, address, other).
- (c) if the submission is on behalf of those alleging a potential or actual harm, the identity of those on whose behalf the Grievance is made, and written confirmation by those represented of the Claimant's authority to lodge the Grievance on their behalf.
- (d) the description of the potential or actual harm.
- (e) Claimant's statement of the risk of harm or actual harm (description of the risk/harm and those affected, names of the individual(s) or institutions responsible for the risk/harm, the location(s) and date(s) of harmful activity).
- (f) what has been done by Claimant thus far to resolve the matter.
- (g) whether the Claimant wishes that their identity is kept confidential.
- (h) the specific help requested from the GRM.

However, complainants are not required to provide all of the information listed above. Initially, the complainant need only provide enough information to determine eligibility. If insufficient information is provided, the GRM has an obligation to make a substantial, good faith effort to contact the complainant to request whatever additional information is needed to determine eligibility, and if eligible, to develop a proposed response.

VII. Logging, Acknowledgment, and Tracking

All Grievances and reports of conflict will be received, assigned a tracking number, acknowledged to Claimant, recorded electronically, and subject to periodic updates to the Claimant as well as the office file.

Within one (1) week from the receipt of a Grievance, the GRM will send a *written* acknowledgement to Claimant of the Grievance received with the assigned tracking number.⁵

Each Grievance file will contain, at a minimum:

- i. The date of the request as received.
- ii. The date the written acknowledgment was sent (and oral acknowledgment if also done).
- iii. The dates and nature of all other communications or meetings with the Claimant and other relevant Stakeholders.
- iv. Any requests, offers of, or engagements of a Mediator or Facilitator.
- v. The date and records related to the proposed solution/way forward.
- vi. The acceptance or objections of the Claimant (or other Stakeholders).
- vii. The proposed next steps if objections arose.
- viii. The alternative solution if renewed dialogues were pursued.
- ix. Notes regarding implementation.
- x. Any conclusions and recommendations arising from monitoring and follow up.

IX. Maintaining Communication and Status Updates

Files for each Grievance will be available for review by the Claimant and other Stakeholders involved in the Grievance, or their designated representative(s). Appropriate steps will be taken to maintain the confidentiality of the Claimant if previously requested.

The GRM will provide periodic updates to the Claimant regarding the status and current actions to resolve the Grievance. Not including the acknowledgment of receipt of the Grievance, such updates will occur within reasonable intervals (not greater than every thirty (30) days).

X. Investigation and Consensus Building

Within one (1) week of receiving a Grievance, [Implementing Partner] will notify the **PB/GRM Sub-Committee (GRM SC)/GRM Task Team (GRM TT)** and any other relevant institutions of the receipt of the Grievance.

[IF THE PB, RATHER THAN A PRE-DESIGNATED GRM SC OR GRM TT IS THE PRIMARY BODY RECEIVING COMPLAINTS: The PB will identify a specific team of individuals drawn from the PB and/or their respective institutions to develop a response to the Grievance. The names of these individuals will be made available to the Claimant.]

The designated PB members/GRM SC/GRM TT will promptly engage the Claimant and any other relevant Stakeholders deemed appropriate, to gather all necessary information regarding the Grievance.

Through the PB members/GRM SC/GRM TT, the GRM will have the authority to request from relevant Government institutions any information (documents or otherwise) relevant to resolving the Grievance and avoiding future Grievances of the same nature.

As necessary, the PB members/GRM SC/GRM TT will convene one or more meetings with relevant individuals and institutions in [national capital], or elsewhere in [name of country] as needed.

⁵ Oral acknowledgments can be used for expediency (and also recorded), but must be followed by a written acknowledgment

The objective of all investigative activities is to develop a thorough understanding of the issues and concerns raised in the Grievance and facilitate consensus around a proposed solution and way forward.

The PB members/GRM SC/GRM TT will procure the cooperation of their respective staff with the investigation.

At any point during the investigation, the PB members/GRM SC/GRM TT may determine that an onsite field investigation is necessary to properly understand the Grievance and develop an effective proposed solution and way forward.

XI. Seeking Advisory Opinion and/or Technical Assistance

At any point after receiving a Grievance and through to implementation of the proposed solution and way forward, the PB members/GRM SC/GRM TT may seek the technical assistance and/or an advisory opinion from any entity or individual in [country] or internationally which may reasonably be believed to be of assistance.

XII. Making Proposed Actions and Solutions Public and Overseeing Implementation

The PB members/GRM SC/GRM TT will communicate to the Claimant one or more proposed actions or resolutions and clearly articulate the reasons and basis for proposed way forward.

If the Claimant does not accept the resolution, the PB members/GRM SC/GRM TT will engage with the Claimant to provide alternative options.

If the Claimant accepts the proposed solution and way forward, the GRM will continue to monitor the implementation directly and through the receipt of communications from the Claimant and other relevant parties. As necessary, the GRM may solicit information from the relevant parties and initiate renewed dialogue where appropriate.

In all communications with the Claimant and other stakeholders, the GRM will be guided by its problem-solving role, non-coercive principles and process, and the voluntary, good faith nature of the interaction with the Claimant and other stakeholders.

XII. Monitoring and Evaluation

Bi-annually, the GRM will make available to the public, a report describing the work of the GRM, listing the number and nature of the Grievances received and processed in the past six months, a date and description of the Grievances received, resolutions, referrals and ongoing efforts at resolution, and status of implementation of ongoing resolutions. The level of detail provided with regard to any individual Grievance will depend on the sensitivity of the issues and Stakeholder concerns about confidentiality, while providing appropriate transparency about the activities of the GRM. The report will also highlight key trends in emerging conflicts, Grievances, and dispute resolution, and make recommendations regarding:

- i. Measures that can be taken by the Government to avoid future harms and Grievances.
- ii. improvements to the GRM that would enhance its effectiveness, accessibility, predictability, transparency, legitimacy, credibility, and capacity.

XIII. Mediation

For the option of independent mediation, mediators on the roster/panel should have at least the following qualifications:

- Professional experience and expertise in impartial mediation.
- Knowledge of [project type and activities in the country] and the region, including an understanding of indigenous and tribal culture and practices.
- [National and local language, as appropriate] proficiency.
- Availability in principle for assignments of up to 20 days.
- Willingness to declare all relationships and interests that may affect their ability to act as impartial mediators in particular cases.

If mediation succeeded in resolving the dispute or grievance, the outcome will be documented by [Implementing Partner] and reviewed by the Task Team. If it is unsuccessful, stakeholders will have the option to return to the PB members/GRM SC/GRM TT for assistance.

XIV. Without Prejudice

The existence and use of this GRM is without prejudice to any existing rights under any other complaint mechanisms that an individual or group of individuals may otherwise have access to under national or international law or the rules and regulations of other institutions, agencies, or commissions.