

WWF Environmental and Social Safeguards - Risk Categorization Memorandum

Version 2.1 November 2020

Project Name: GBFF Madagascar - Sustainable Financing and Inclusive Management to Perpetuate Madagascar's Locally Managed Marine Areas (LMMAs)	Date: September 5, 2025
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Executing Agency/ies:

Ministry of Environment and Sustainable Development (MEDD); Fondation pour les Aires Protégées et la Biodiversité de Madagascar (FAPBM)

Landscape Categorization on E&S Risks:

High Risk - (A) ___ and/or (Special Consideration) ___ /Medium Risk (B) X / Low Risk (C)___

Substantive Safeguard Standards Triggered:	Yes/ TBC	No
Natural Habitats	X	
Pest Management		X
Indigenous Peoples		X
Restriction of Access & Resettlement	X	
Community Health, Safety and Security	X	
Physical and Cultural Resources	X	

In addition to the Substantive Safeguards above, the four Process Standards apply to all projects:

- Environmental and Social Risk Management
- Consultation and Disclosure
- Community Stakeholder Engagement
- Grievance Mechanism

Landscapes categorized as low risk have been screened in accordance to the Standard on E&S Risk Management.

Project Area Context

Marine and coastal ecosystems in Madagascar are increasingly under pressure from overfishing, habitat degradation, illegal exploitation, and the effects of climate change, including coastal erosion and rising sea levels. These ecosystems play a critical role in sustaining biodiversity, supporting local livelihoods, and contributing to climate resilience, as more than 1.5 million people depend directly on coastal resources for food security and income. In response, Madagascar has seen a significant expansion of Locally Managed Marine Areas (LMMAs), with more than 280 sites established across its coastline. However, many LMMAs continue to face operational challenges, including limited legal recognition, insufficient access to long-term financing, and weak institutional coordination. These constraints limit their ability to contribute effectively to national conservation objectives.

The objective of the project is to facilitate sustainable financing solutions and effective and inclusive management practices to strengthen the conservation and sustainable use of coastal and marine biodiversity in LMMAs across three seascapes in western Madagascar: Diana, Manambolo-Tsiribihina, and Mahafaly. These areas include ecosystems of high ecological value and are home to numerous community-based initiatives.

The project is structured around five components:

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- Component 1: will strengthen the enabling environment for LMMA governance through legal and regulatory improvements, support to marine spatial planning, and the formal recognition of LMMAs as other effective area-based conservation measures (OECMs).
- Component 2: will develop and pilot sustainable and blended finance mechanisms for LMMAs, while strengthening the fiduciary and operational capacities of national conservation trust funds (FAPBM and Tany Meva) to channel resources to community-level actors.
- Component 3: will reinforce inclusive governance and ecological resilience in selected LMMA sites through support to local management bodies, the development of operational management plans, and the promotion of nature-based livelihoods in collaboration with local stakeholders.
- Component 4: will focus on knowledge management and communication, including the development and dissemination of tools, peer-to-peer exchanges, and coordination with national and regional initiatives.
- Component 5: will ensure effective project monitoring and evaluation, integrating gender-responsive indicators and supporting adaptive management throughout implementation.

The project is implemented by the Ministry of Environment and Sustainable Development (MEDD), acting as the Lead Executing Entity. WWF-US serves as the GEF Agency, and WWF-Madagascar provides technical support to field-level implementation. The project is financed by the Global Biodiversity Framework Fund (GBFF), with a GEF grant allocation of USD 5,934,747, and co-financing from MEDD and FAPBM.

In accordance with the WWF's Environmental and Social Safeguards Framework (ESSF), the project has been classified as Category B, reflecting the presence of moderate environmental and social risks and impacts. These are expected to be site-specific, reversible, and manageable with appropriate mitigation measures. Based on the environmental and social screening finalized in July 2025, the project may potentially affect the following cross-cutting principles: Human Rights; Gender Equality and Women's Rights; Children's Rights; Conflict Sensitivity; and Climate Change. In addition, the following WWF Safeguards Standards have been triggered: Protection of Natural Habitats; Cultural Resources; Community Health, Safety, and Security; and Restriction of Access and Voluntary Resettlement. The Indigenous Peoples and Pest Management standards were reviewed and found not to be triggered, based on the project's scope and available evidence from stakeholder consultations.

Summary of Key Safeguard Issues

Natural Habitats – This safeguard has been triggered precautionarily, as a few project activities could generate localized and low-level risks if they are not properly managed. Some of these potential risks include: the construction of small-scale infrastructure such as LMMA posts or storage units, which could cause minor disturbance to vegetation or soil during site preparation; the development of ecotourism or nature-based economic activities which may result in increased pressure on sensitive sites or the generation of waste, especially if the number of tourists is not well controlled; and the introduction of non-native species through aquaculture or reforestation which could, if not carefully planned, pose a risk of biological contamination or competition with local species. Although these risks are expected to be minimal and manageable, environmental screening and where relevant, Environmental Impact Assessments (EIAs) will be conducted to ensure that potential impacts on biodiversity and ecosystem services are properly identified and mitigated.

Restriction of Access & Resettlement – The project aims to strengthen community-based management of coastal and marine ecosystems through the implementation of LMMAs. However, as part of this process, communities may define or reinforce local rules regulating access to natural resources, which could include seasonal or temporary closures of fishing or mangrove harvesting areas; bans or restrictions on specific fishing gears, techniques, or target species; access limitations to ecologically or spiritually sensitive sites; clarification of customary use rights, potentially excluding certain users (e.g. migrants, non-members of community structures). These potential restrictions are expected to be community-led and based on existing customary norms (e.g. taboos, Dina), with support from project partners to ensure inclusive and transparent decision-making. However, this safeguard has been triggered since at this stage of project preparation, the

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exact nature, scope, and location of such restrictions cannot yet be determined. These potential restrictions will be defined during project implementation through participatory planning with each LMMA, where the process may result in the development of specific Livelihood Restoration Plans (LRPs).

Community Health, Safety and Security – This safeguard has been triggered due to the implementation of certain activities, in particular those reinforcing community-based enforcement mechanisms or shifting local power dynamics, could contribute to increased risk of intimidation, retaliation, or abuse and lead to safety issues. This includes general risks affecting all community members, as well as specific risks of GBV and social backlash linked to women’s empowerment. Some relevant activities include: engagement with a wide range of actors (e.g. consultants, enforcement actors, tourism staff, NGOs, and other partners), which may increase the risk of GBV, including SEAH, especially in contexts of unequal power dynamics. Mitigation plans and GBV/SEAH protocols may be necessary to reduce these risks; empowerment of women and youth through project activities, particularly their involvement in community governance or income-generating activities, may be perceived as a threat to established power dynamics; reinforcement of Dina and KMD structures, which, while legitimate and community-based, may provoke tensions; and the introduction of new resource restrictions or access rules, which could lead to social tensions, especially if decisions are perceived as unfair or imposed by dominant groups. The project will closely monitor and screen activities for these risks, which may lead to the development of associated mitigation plans during implementation.

Cultural Resources – This safeguard has been triggered since the project area includes both tangible and intangible cultural resources that are significant to local communities across all three seascapes (Diana, MTB, Mahafaly). Tangible cultural resources include ancestral tombs (fasana) and sacred sites or forests, which are present in all three regions. These places are subject to local taboos (fady)—access is often restricted or entirely prohibited, and any disturbance is socially sanctioned. While these sites are not formally registered as cultural heritage, they are widely recognized at the community level as sacred and inviolable. Intangible cultural resources are particularly prominent among Vezo communities who maintain a complex relationship with the sea based on spiritual beliefs, taboos, and ritual practices. Impacts to these cultural resources are expected to be exceptional, given the project’s participatory approach, but could occur if certain subgroups (e.g. elders, women, migrant families) are not properly consulted or if spiritually significant areas are not identified and respected. Therefore, to mitigate any residual risk, the ESMF will include measures to ensure inclusive consultation, the identification of culturally sensitive areas, and the adaptation of interventions to local cultural rules and beliefs.

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Summary of Cross Cutting Issues; (Human Rights, Gender Equality and Women's Rights, Children's Rights, Conflict Sensitivity and Climate Change).

Human Rights - Several human rights issues are present in the project area and could affect implementation if not proactively addressed. Customary tenure insecurity poses risks in all three seascapes, where communities rely on customary land and marine tenure systems to access and manage natural resources. These practices are socially legitimate and deeply embedded in local norms, but their legal status remains conditional and limited under Malagasy law. Risks of exclusion of most marginalized groups due to local management structures, such as Local Community-based Committees, fisheries cooperatives and Dina-based committees, are often organized around lineage, long-standing residency, or inherited social status. As a result, women and youth, migrant fishers, non-affiliated residents, and other peripheral groups are frequently excluded from rule-making processes and may have limited access to project benefits or influence over resource governance decisions. Risk of informal pressure and social retaliation linked to local enforcement is present in several sites, where the enforcement of local rules—through Dina, natural resources committees, or local patrols—has led to social tensions and informal sanctions, particularly when individuals are fined, excluded from fishing zones, or have their gear confiscated. Given these potential human rights issues, the project will support the improvement of legal, policy and institutional frameworks, build the capacity of all stakeholders and facilitate the participation of rights-holders (especially the most vulnerable) in decision-making processes and benefit sharing, to mitigate and avoid perpetuating these risks.

Gender Equality and Women Rights - Gender-related issues are known to be present in the project areas, due in part to traditional gender roles and norms, and limited formal recognition. Women and girls participate in natural resource management in coastal communities, especially in collecting marine resources, yet their contributions are often undervalued or overlooked due to prevailing gender norms. In addition, resource tenure through current LMMA arrangements operate outside formal legal frameworks, making women's (and men's) community rights to manage marine resources insecure, especially for groups with less decision-making power. Changes and disruption in livelihoods, restricted access to some resources and improved women's empowerment due to project activities could potentially exacerbate risks of gender inequalities and gender-based violence in the project areas. Therefore, to address these risks, during the design phase, the project will benefit from a standalone gender analysis and a specific gender action plan defined according to conclusions and recommendations from the analysis and stakeholder consultations. The gender action plan will include measures and actions per project component and outcome to minimize and avoid these potential risks.

Children's Rights - Several structural issues affecting children's rights are present in the project areas, particularly in coastal and rural communities. These issues—while not caused by the project—may affect implementation if not proactively addressed. In areas where access to fishing or other natural resources may be temporarily restricted (e.g. due to gear bans, seasonal closures, or community rules), households could experience short-term income loss or food insecurity. This may lead to reduced school attendance, nutritional stress, or increased reliance on children's work to compensate. In addition, the project's livelihood support measures involve or incentivize household-based labour—for instance through activities such as aquaculture, fisheries value chain development, or ecological restoration conducted by local groups. In rural coastal communities where child labour is already common, these activities could unintentionally reinforce children's involvement in income-generating tasks, particularly in fishing-related work. To minimize or avoid any negative impacts on children, the project will ensure WWF's Child Safeguarding Policy is applied and measures are put in place to decrease any potential risks.

Conflict Sensitivity – The project operates in rural coastal areas of Madagascar where the combination of natural resource scarcity, informal enforcement, and exclusion from decision-making generates localised tensions that are relevant to safeguards and should be closely monitored. The main sources of tension include: competition over natural resources and access rights where tensions exist within and between communities, particularly between resident populations and seasonal or migrant fishers; local governance imbalances in some villages where local institutions are perceived as being dominated by a single clan or family, which dynamics may weaken legitimacy and fragment community cohesion; structural exclusion from participation such as migrant fishers, youth, and women who are frequently excluded from local governance bodies and decision-making processes; and local patrolling and sanctioning mechanisms which risk escalating any existing tensions between groups. The project will use highly participatory and inclusive approaches to consultation and closely monitor

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activities to minimize risks and avoid exacerbating or creating any new tensions or conflicts within communities in the project areas.

Climate Change - The project seascapes are already experiencing observable impacts of climate change that affect both ecosystems and livelihoods. These impacts are particularly severe in coastal and low-lying areas, where communities are highly dependent on natural resources and have limited adaptive capacity. These impacts are already affecting project-relevant dimensions such as fisheries productivity, the viability of ecological restoration, and the sustainability of LMMAs. Vulnerable groups—such as women, youth, and migrants—are disproportionately affected due to reduced access to information, capital, and secure resource rights. The climate risks have been well analyzed and are considered moderate and avoidable, and the project will address them by screening all livelihood interventions for climate robustness; supporting diversified income strategies where possible; and ensuring community ownership and regular review of activities to maintain adaptive flexibility.

Required Actions for Impact Assessment (ESIA) and Mitigation Framework (ESMF):

This project will be required to create an effective Environmental and Social Management Framework (ESMF). The ESMF will also include a Process Framework, as well as further screenings on Natural Habitat, Community Health and Security, and Cultural Resources impacts, as deemed necessary if further risks are identified. This will be done during project implementation using an ESS Impact Screening tool, and the creation of landscape-specific ESMPs.

Additionally, a Stakeholder Engagement Plan, a Grievance Redress Mechanism, a Gender Assessment and Gender Action Plan will be developed and submitted with the CER Doc.

Signed by:
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