



**Sustainable Financing and Inclusive Management to Perpetuate Madagascar's
Locally Managed Marine Areas (LMMAs) - GEF Project ID: 11802**

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK & PROCESS FRAMEWORK

September 4, 2025

GEF Agency: WWF US

**Lead Executing Agency: Ministry of Environment and Sustainable Development
(MEDD)**

Table of Contents

LIST OF ACRONYMS	3
1. INTRODUCTION	5
1.1. OBJECTIVE OF THE ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF).....	6
1.2. OBJECTIVE OF THE PROCESS FRAMEWORK (PF)	7
1.3. ESMF/PF PREPARATION METHODOLOGY.....	8
2. PROJECT DESCRIPTION	8
2.1. PROJECT OBJECTIVES AND COMPONENTS	8
2.2. PROJECT AREA PROFILE.....	10
2.3. DEMOGRAPHIC AND ECONOMIC INFORMATION	15
2.4. GENDER.....	17
3. ENVIRONMENT AND SOCIAL POLICY, REGULATIONS AND GUIDELINES	19
3.1. MADAGASCAR POLICIES, LAWS, REGULATIONS GUIDELINES	19
3.2. WWF SAFEGUARDS STANDARDS AND PROCEDURES APPLICABLE TO THE PROJECT.....	23
3.3. GAPS BETWEEN MADAGASCAR LAWS AND POLICIES AND THE WWF'S SIPP	29
4. ANTICIPATED ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATION MEASURES	31
4.1. ADVERSE ENVIRONMENTAL IMPACTS.....	31
4.2. ENVIRONMENTAL MITIGATION MEASURES	34
4.3. ADVERSE SOCIAL IMPACTS.....	36
4.4. SOCIAL MITIGATION MEASURES	38
4.5. PROCESS FRAMEWORK: LIVELIHOOD RESTORATION MEASURES	42
5. IMPLEMENTATION ARRANGEMENTS	44
5.1. PROCEDURES FOR THE IDENTIFICATION AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL IMPACTS.....	44
5.2. GUIDELINES FOR ESMP DEVELOPMENT	46
5.3. STAKEHOLDERS' ROLE & RESPONSIBILITIES IN THE ESMF IMPLEMENTATION	46
5.4. MONITORING	49
5.5. COMMUNITY ENGAGEMENT	50
5.6. GUIDANCE FOR SEAH RISK MITIGATION	51
5.7. COMMUNICATIONS AND DISCLOSURE	52
5.8. CAPACITY BUILDING AND TECHNICAL ASSISTANCE	53
5.9. GRIEVANCE MECHANISMS	53
5.10. BUDGET	55
ANNEX 1. SAFEGUARD ELIGIBILITY AND IMPACTS SCREENING TOOL	56
PART 1: BASIC INFORMATION	56
PART 2: ELIGIBILITY SCREENING	57
PART 3: IMPACTS SCREENING	58
PART 4: SCREENING CONCLUSIONS.....	63
ANNEX 2. EXCLUSION LIST	64

LIST OF ACRONYMS

CLB	<i>Communauté Locale de Base</i>
CTF	Conservation Trust Fund
GBFF	Global Biodiversity Framework Fund
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Safeguards
ESSF	Environmental and Social Safeguards Framework
FPIC	Free Prior and Informed Consent
GAP	Gender Action Plan
GBV	Gender-Based Violence
GCF	Green Climate Fund
GEF	Global Environmental Facility
GELOSE	<i>Gestion Locale Sécurisée</i>
GRM	Grievance Redress Mechanism
IPP	Indigenous Peoples Plan
IPPF	Indigenous Peoples Planning Framework
LMMA	Locally Managed Marine Areas
LRP	Livelihood Restoration Plan
MEDD	<i>Ministère de l'Environnement et du Développement Durable</i>
MPEB	<i>Ministère de la Pêche et de l'Économie Bleue</i>
MTB	Manambolo-Tsiribihina
NSC	National Steering Committee
OECM	Other Effective area-based Conservation Measures
OHS	Occupational Health and Safety
PAP	Project Affected People
PF	Process Framework
PMU	Project Management Unit
SEAH	Sexual Exploitation, Abuse and Harassment
SEP	Stakeholder Engagement Plan
SIPP	Safeguards Integrated Policies and Procedures
TGRH	<i>Transfert de Gestion des Ressources Halieutiques</i>
TGRN	<i>Transfert de Gestion des Ressources Naturelles</i>
VOI	<i>Vondron'Olona Ifotony</i>

WWF

World Wildlife Fund

1. INTRODUCTION

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:

- 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.

In line with this risk profile, the project requires the preparation and implementation of the following safeguard instruments:

- An Environmental and Social Management Framework (ESMF), which outlines mitigation principles, institutional responsibilities, monitoring tools, and capacity-building needs;
- A Process Framework (PF) to address potential access restrictions stemming from natural resource management rules;
- A Stakeholder Engagement Plan (SEP), including a grievance mechanism;
- A Gender Action Plan (GAP) to promote equity and inclusion throughout implementation.

1.1. Objective of the Environmental and Social Management Framework (ESMF)

The preparation of this ESMF was required in accordance with the WWF's Environmental and Social Safeguards Framework (ESSF), through guidance and procedures described in WWF's Safeguards Integrated Policies and Procedures (SIPP), in order to identify and manage the environmental and social risks and impacts of the project ***Sustainable Financing and Inclusive Management to Perpetuate Madagascar's Locally Managed Marine Areas (LMMAs)***. The ESMF aims to outline the principles, procedures, and mitigation measures for addressing environmental and social impacts associated with the project in accordance with the laws and regulations of Madagascar and with the ESSF.

Since the precise scope of activities that will be implemented as part of the project will only be determined during the implementation phase, site-specific social and environmental impacts are uncertain at this stage. Thus, the development of site-specific Environmental and Social Management Plans (ESMPs) is currently not feasible, and an ESMF is necessary to set out procedures for addressing potential adverse social and environmental impacts that may occur during project activities. Site-specific ESMPs will be developed pursuant to the guidance provided by this ESMF during project implementation.

The specific objectives of the ESMF include the following:

- Carry out a preliminary identification of the positive and negative social and environmental impacts and risks associated with the implementation of the Project, including any SEAH risks;
- Outline the legal and regulatory framework that is relevant to the Project implementation;
- Specify appropriate roles and responsibilities of actors and parties involved in the ESMF implementation;
- Propose a set of preliminary recommendations and measures to mitigate any negative impacts and enhance positive impacts;
- Develop a screening and assessment methodology for potential activities, that will allow an environmental/social risk classification and the identification of appropriate safeguards instruments;

- Set out procedures to establish mechanisms to monitor the implementation and efficacy of the proposed mitigation measures; and
- Outline requirements related to disclosure, grievance redress, capacity building activities, and budget required for the implementation of the ESMF.

1.2. Objective of the Process Framework (PF)

The Project triggers the WWF's Standard on Access Restriction and Resettlement as it may restrict or otherwise affect access to natural resources, and the livelihood activities of project affected people (PAP). This Process Framework (PF) describes the process by which affected communities participate in identification, design, implementation and monitoring of relevant project activities and mitigation measures. The purpose of this PF is to ensure participation of Project Affected People (PAP) while recognizing and protecting their rights and interests and ensuring that they do not become worse off as a result of the project. Specifically, the PF will:

- Describe activities that may involve new or more stringent restrictions on use of natural resources in the project area.
- Establish the mechanism through which the local communities can contribute to the project design, implementation and monitoring.
- Identify the potential negative impacts of the restriction on the surrounding communities, including any gendered differences or SEAH risks associated with access restriction or differing uses of natural resources.
- Specify the criteria for eligibility of economically displaced persons to receive compensation benefits and development assistance (no physical displacement will be allowed under this project or any WWF project).
- Describe the mitigation measures required to assist the economically displaced persons in their efforts to improve their livelihoods, or at least to restore them, in real terms, while maintaining the sustainability of the landscape/seascape type, will be identified.
- Describe the grievance procedure or process for resolving disputes to natural resource use restrictions.
- Describe the participatory monitoring arrangements with neighboring community members.

As the project intends to enhance the livelihoods and resilience of local communities, the allocation of project benefits among local community members is particularly important. The intent of the framework is to ensure transparency and equity in the planning and implementation of activities by the project. This framework details the principles and processes for assisting communities to identify and manage any potential negative impacts of the project activities. Since the exact social impacts will only be identified during project implementation, the PF will ensure that mitigation of any negative impacts from project investments through a participatory process involving the affected stakeholders and rightsholders. It will also ensure that any desired changes by the communities in the ways in which they exercise customary tenure rights in the project sites would not be imposed but should emerge from a consultative process.

1.3. ESMF/PF Preparation Methodology

The ESMF/PF was prepared based on the following sources of information:

- Key project documents, including the PIF, CEO Endorsement Request Form, and the ESS Screening Form (July 2025);
- Stakeholder consultations conducted during the PPG phase, including a national workshop (12 June 2024), field missions in eight LMMA sites across the three target seascapes (June 2025), and bilateral meetings with MEDD, FAPBM, Tany Meva, MIHARI, and WWF teams;
- Site-level documentation related to the eight LMMA sites visited, such as LMMA management plans, community development plans, approved Dina, and local governance agreements;
- Technical studies and strategic reports, including documentation produced by WWF (e.g., diagnostics on mangrove dynamics, vulnerability assessments, gender analyses in the three seascapes, livelihood and governance profiles), reference materials from MIHARI (such as the LMMA classification guide), strategic and operational documentation from FAPBM and Tany Meva, regional development plans produced by the Government of Madagascar, and anthropological or academic studies on Vezo communities;
- National legal and regulatory texts relevant to environmental governance, community resource management, and stakeholder engagement, including laws and decrees on GELOSE, TGRH, TGRN, and OECMs.

The ESMF/PF draws on the outcomes of the bibliographic review and stakeholder consultations, as well as on the legal and institutional framework of Madagascar and the requirements set forth in WWF's ESSF and SIPP. National safeguards-related laws apply to the project given its implementation within the jurisdiction of Madagascar, while WWF's SIPP apply due to WWF's role as a GEF Implementing Agency.

In order to avoid duplications and for ease of reference, the ESMF and PF are combined into a single document.

2. PROJECT DESCRIPTION

This chapter outlines the objectives of the project Sustainable Financing and Inclusive Management to Perpetuate Madagascar's Locally Managed Marine Areas (LMMAs), its components, milestones, and major supported activities.

2.1. Project Objectives and Components

The project objective 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, Mahafaly), including critical mangrove and coral reefs, for people, biodiversity and climate.

The project is structured into five interlinked components, each contributing to the achievement of the project's overall objective:

(a) Component 1: Enabling environment for LMMA effective management

This component aims to create an enabling policy, legal, and institutional framework for functional and legalized LMMAs within Madagascar's existing blue economy initiatives. It will promote legal recognition of LMMAs, harmonize sectoral policies (e.g., TGRN, TGRH, Dinas, Dinabe, OECMs), and integrate LMMAs into national spatial planning frameworks. It also supports the establishment of Madagascar's OECM network, contributes to the country's biodiversity targets (Target 3 of the Global Biodiversity Framework), and enhances coordination among MEDD, MPEB, and MDAT. The component is structured around two outcomes:

- Outcome 1.1: Improved regulatory framework, planning, and capacities to harmonize sectoral frameworks and secure community rights to govern and manage marine resources and land. Activities will include legal reviews, spatial planning at the seascape level, institutional capacity-building, and promotion of legal protections for community environmental defenders.
- Outcome 1.2: National OECM network expanded from relevant OECMs candidates to secure community management rights and report against GBF commitments. Activities will focus on criteria harmonization, participatory site identification, database creation, and the operationalization of a national OECM monitoring system.

(b) Component 2: Sustainable finance solutions and strengthened CTF capacities to support LMMAs

This component seeks to ensure long-term financial sustainability for LMMA governance by supporting enabling conditions for finance, piloting innovative financial mechanisms, and strengthening the fiduciary and operational capacities of Madagascar's two conservation trust funds (FAPBM and Tany Meva). The component includes:

- Outcome 2.1: Enabling conditions for sustainable financing in place, including diagnostics of costs and financing gaps, policy recommendations, and targeted institutional capacity-building.
- Outcome 2.2: Potential national and site-level sustainable financing mechanisms and/or blended finance options for LMMAs piloted, such as Project Finance for Permanence (PFP), the Marine Conservation Resilience Fund (MCRF), and blended finance options. It also includes scoping, risk assessment, and proposal development.
- Outcome 2.3: Strengthened CTF capacities to flow funding to LMMAs, including fiduciary systems, disbursement models, and catalytic grants.

(c) Component 3: Inclusive Management for an effective and social and ecologically resilient LMMA Network

This component supports LMMA implementation at site level through technical assistance, institutional support, and livelihood interventions. It builds local governance capacity, strengthens enforcement, and promotes sustainable value chains and microenterprises. It includes:

- Outcome 3.1: Strengthened capacity of LMMA managers and local leadership communities to effectively govern, manage and finance LMMA and LMMA networks to achieve GBF goals.
- Outcome 3.2: Improved livelihoods and sustainable practices within targeted LMMAs to support a better ecological status. This outcome focuses on diversifying and strengthening

sustainable livelihoods in order to alleviate pressure on marine ecosystems and fisheries and to improve community resilience. This includes support for seaweed farming, sustainable fisheries, bioeconomy development, and financial inclusion.

(d) Component 4: Knowledge management and communication

This component promotes learning, visibility, and coordination. It includes development of a knowledge management strategy, inclusive communication materials, learning exchanges, and capitalization of project experiences.

- Outcome 4.1: Project communication and knowledge management. Outputs include communication tools, learning platforms, and integration of traditional knowledge.

(e) Component 5: Monitoring and Evaluation

This component establishes a robust, gender-sensitive M&E system to guide project implementation and adaptive management. It includes periodic reporting, independent evaluations, and biodiversity tracking.

- Outcome 5.1: An effective and gender-sensitive M&E framework is established and efficiently utilized throughout the project, supported by an inception report, core indicators, annual plans, and stakeholder feedback.

2.2. Project Area Profile

The project targets three coastal and marine seascapes along Madagascar's western coast: Diana in the north, Manambolo–Tsiribihina (MTB) in the center, and Mahafaly in the southwest. These areas host globally important marine biodiversity and provide vital ecosystem services, while sustaining thousands of households through small-scale fishing, subsistence farming, and natural resource-based livelihoods. Despite their ecological significance, the seascapes face growing threats from environmental degradation, socio-economic vulnerability, and institutional fragmentation. This section outlines the ecological, climatic, social, institutional, and cultural context of the project areas.



Figure 1. Landscapes targeted by the project (Diana, MTB, Mahafaly).

(a) Geographic and Environmental Context

With the longest coastline in Africa (5,600 km) and the fourth-largest Exclusive Economic Zone (EEZ) in the world, spanning over 1.22 million square kilometers (nearly twice its land area)¹, Madagascar hosts an exceptional variety of marine habitats. The project seascapes lie within the Mozambique Channel, a zone of high ecological productivity driven by seasonal upwellings and larval connectivity. They include extensive deltaic systems, coastal wetlands, mangrove forests, seagrass beds, and coral reefs—all interlinked and essential to ecological integrity and local livelihoods.

The Diana region, located at the northern tip of Madagascar, spans approximately 2 million hectares and includes 550 km of coastline. Coastal ecosystems here are shaped by strong tidal dynamics, reef structures, and freshwater inputs. Key ecological features include the Nosy Hara Marine Park, the Ambilobe Bay mangroves, and the Sahamalaza Peninsula. The region lies within the Northern Mozambique Channel—recognized as one of the most biodiverse coral reef zones globally.

The MTB landscape, in Menabe and Melaky, spans 3.8 million hectares and includes Madagascar's largest mangrove corridor (over 70,000 ha), shaped by sediment-laden river mouths. The area is characterized by deltaic plains, estuarine wetlands, fragmented coral patches, and shallow coastal waters. Sediment discharge from upstream deforestation contributes to turbidity and habitat stress.

In the southwest, the Mahafaly landscape extends across 1.2 million hectares between the Onilahy River and Cap Sainte-Marie. This area contains the third-largest coral reef system in the Western Indian Ocean, 3,000 ha of mangroves, and a narrow arid hinterland dominated by spiny forest. Persistent upwelling supports high marine productivity, while extreme aridity and frequent cyclones exacerbate ecological fragility.

(b) Biodiversity Profile

Madagascar ranks among the world's 17 megadiverse countries with globally unique terrestrial and marine ecosystems and more than 80% of its land species endemic to the island. It hosts over 5,000 marine species. Its western seascapes support endemic, rare, and globally threatened taxa. Biodiversity assets include:

- Approximately 1,540 marine fish species, including 30 endemics;
- 123 shark and ray species, of which 31 are threatened and three critically endangered;
- Nine marine mammal species (e.g., dugongs, whales);
- 1,400 gastropods, 306 sponges, and 650 cnidarians.

The Mozambique Channel, the Northern Mozambique Channel, and the Southern Madagascar 'Deep South' are all recognized. These areas support rich upwellings, pelagic larval retention zones, endemic species, and critical feeding or breeding grounds for whales, seabirds, and turtles.

The biodiversity profiles of the three target seascapes reflect this broader richness.

In Diana, the landscape includes key protected forest areas such as the Montagne d'Ambre and Tsaratanàna massifs, which are biodiversity-rich and essential for water regulation and endemic species. The region's 550 km of coastline and 307,903 km² of marine space lie within the Northern Mozambique Channel, recognized as the second-richest coral reef biodiversity hotspot globally and

¹<https://documents1.worldbank.org/curated/en/099635010242211316/pdf/P17701803653a407f0bbd80a9da77fa6f51.pdf>

as an Ecologically or Biologically Significant Area (EBSA) under the Convention on Biological Diversity (CBD).

The MTB region supports some of the country's most intact mangrove forests, which serve as critical nurseries for shrimp, crab, and reef fish. This region lies within the Mozambique Channel, also recognized as an EBSA under the CBD. Coral patches and estuarine wetlands complement these systems but are increasingly affected by overfishing and agricultural expansion.

The Mahafaly seascape is a hotspot of floral and faunal endemism, hosting over 95% endemic plant species, several threatened terrestrial animals and one of the last strongholds of spiny forest ecosystems. It contains exceptional marine biodiversity, including 134 coral species, 234 reef fish species and emblematic marine fauna such as sharks, whales, dolphins, marine turtles, and the coelacanth. Seagrass meadows and mangroves provide habitats for marine turtles, dolphins, and sharks. Biodiversity loss is driven by habitat degradation, illegal fishing, and climate-related stressors.

(c) Climate Change and Environmental Threats

Madagascar is among the countries most vulnerable to climate change, despite contributing only 0.09% of global GHG emissions. The past two decades have seen a threefold increase in climate events compared to the previous 20-year period, including 35 cyclones, 8 floods, and 5 severe droughts².

Madagascar has the highest risk of cyclones in Africa, experiencing three to four cyclones per year on average between November and April, and a major tropical cyclone once every three years. The western coast is particularly exposed to tropical cyclones, storm surges, and drought. Events such as cyclones Enawo (2017) and Batsirai (2022) caused widespread damage to coastal vegetation, community infrastructure, and artisanal fishing fleets. Mangrove and dune systems in Mahafaly, which provide natural coastal defense, are increasingly degraded, reducing their capacity to buffer storm surges. While the frequency of tropical cyclones making landfall is projected to decrease, the intensity of these storms is expected to worsen, with annual damages expected to increase almost fivefold by 2050 relative to the baseline, and higher under a pessimistic (high-emissions) scenario³.

Severe multi-year drought and increasingly erratic rainfall patterns are undermining traditional agricultural and fishing calendars, exacerbating food insecurity particularly in Mahafaly. This situation is pushing migrants toward coastal areas in search of food and livelihoods, further straining already stressed coastal and marine ecosystems. Overfishing, driven by population growth and lack of regulation, has led to the decline of key stocks, including octopus, shrimp, and reef fish. Destructive practices such as beach seine nets, mangrove wood harvesting, and the use of small-mesh nets contribute to habitat degradation and juvenile overharvesting.

Rising sea surface temperatures have already led to coral bleaching events in Madagascar, with notable impacts observed in sites such as Nosy Be, Nosy Hara (Diana), and along the southwest reef systems in the Mahafaly seascape. Climate change projections predict continued warming, leading to more intense and frequent climate-related impacts. Under mid-range and high-emissions scenarios, warming of up to 4°C could be expected by 2100 in Madagascar⁴.

²<https://documents1.worldbank.org/curated/en/099111824123032189/pdf/P17968518331670e51a7891150f8498211d.pdf>

³ Ibidem.

⁴<https://documents1.worldbank.org/curated/en/099111824123032189/pdf/P17968518331670e51a7891150f8498211d.pdf>

Projections show that climate change impacts could reduce the maximum catch potential overall in Madagascar for the fisheries by up to 6% by 2040 and close to 10 percent by 2050 under pessimistic scenarios⁵.

(d) Social Organization

The three project areas are characterized by distinct ethnic compositions, cultural identities, and internal social dynamics. While Malagasy is spoken throughout all sites, each region features local dialectal variants, and French is primarily used in administrative settings. Communities practice a combination of Christianity (Catholic or Protestant) and traditional beliefs, including ancestral rites and spiritual taboos, with no reported inter-religious conflict. However, social divisions linked to ethnicity, clan affiliation, and local governance structures vary across regions.

In the Diana region, the population is predominantly composed of Sakalava coastal communities, historically linked to the Boina kingdom. Small numbers of other coastal groups—such as the Antankarana around Antsiranana and the Antalaotra near Mahajanga—are also present. These communities maintain a strong cultural identity. No major tribal or religious cleavages were reported, but the Sakalava identity remains a structuring factor in community leadership and the enforcement of customary norms.

The Manambolo–Tsiribihina (MTB) landscape is a multi-ethnic region where communities from diverse cultural backgrounds coexist. The Melaky and Menabe regions have been receiving significant in-migration in recent years—according to the PRD Menabe, approximately 2,000 agricultural migrants arrive each year. While the majority of the population (around 45%) is composed of Sakalava, particularly those tracing their lineage to the historical Menabe kingdom, another 40% are identified as Antaisaka, and the remainder includes individuals from a range of other ethnic groups. In addition, the southern Maintirano coast receives a seasonal but notable influx of Vezo fishers, contributing to the cultural diversity and spatial mobility of the population.

In the Mahafaly region, the population includes both Mahafaly and Vezo communities, with more marked internal stratification. The Mahafaly are a pastoral ethnic group with a strong ritual tradition and clan-based organization, while the Vezo represent a maritime cultural identity centered on mobility and ancestral ties to the sea. Although both groups coexist, field data indicate that clan affiliation and lineage-based status significantly influence local power dynamics. In some villages, particularly in Lanirano, a dominant family or clan reportedly exercises disproportionate control over governance decisions. In certain cases, minority tribal groups—such as the Vavalinta—are perceived as excluded from consultation and resource management processes, raising concerns about representativeness and equity. These dynamics are reinforced by differences in settlement history and access to formal recognition within community governance frameworks.

Finally, mobility remains a defining feature of coastal communities, particularly among Vezo populations in the south and southwest. Many households engage in seasonal or circular migration to access fishing grounds or temporary employment, often traveling by dugout canoe and establishing semi-permanent camps along the coastline.

⁵ <https://documents1.worldbank.org/curated/en/099111824123032189/pdf/P179685-83316777-03ae-41e5-a789-150f8498211d.pdf>

(e) Institutional and Governance Context

The project operates in remote coastal areas where governance is shaped by the limited operational presence of formal State institutions and a strong reliance on community-based systems.

At the national level, the MEDD and the MPEB are the principal institutions responsible for environmental protection, fisheries management, and marine spatial planning. Regionally, each seascape is administered by decentralized offices of the MEDD (DREDD) and MPEB (DirPEB), which oversee the implementation of sectoral policies and monitor compliance with resource management rules. These decentralized institutions play a critical role in supporting the negotiation, renewal, and enforcement of TGRH and TGRN contracts that formalize local management rights. These contracts are jointly signed by the local government (communes), the relevant line ministry, and the community-based organizations (VOI/CLB). However, ministries and decentralized services face chronic underfunding, high staff turnover—particularly in key leadership roles—and fragmented mandates.

At the communal level, mayors and communal councils hold legal authority over local development planning and land use. Yet, their technical and financial capacities are often limited. Fokontany chiefs—the lowest administrative tier—serve as intermediaries between communities and formal authorities, playing a key role in mobilization and conflict resolution, especially in isolated areas.

At the local level, customary governance remains highly influential. Local governance is primarily exercised through customary or hybrid structures such as VOIs, Dina committees, and cooperatives. These bodies regulate access to natural resources, enforce community rules, and resolve disputes, often operating with little formal oversight. In many areas, Dina are formally recognized by tribunals and integrated into local management frameworks, thereby conferring legitimacy to community-based rules.

Finally, the role of seasonal or transitory fishers must be taken into account. These actors play a significant role in resource use but are typically excluded from local governance structures. While some pay access fees to VOIs, they are not involved in rule-setting or enforcement processes, which can lead to tensions—particularly where migrants are perceived as less compliant with locally agreed Dina. Communities have underscored the lack of structured mechanisms to engage these mobile populations in decision-making, despite their recurrent and often sustained presence during peak fishing periods.

(f) Cultural and Spiritual Significance

The project seascapes are home to coastal populations whose identities, livelihoods, and worldviews are deeply intertwined with the marine environment. Among them, the Vezo people represent one of the most culturally distinct fishing communities in the Western Indian Ocean. The Vezo define their identity not through ethnicity or territory, but through their intimate, daily relationship with the sea. Their maritime knowledge and spiritual beliefs are central to their social organization and to the transmission of ecological knowledge across generations⁶.

Vezo cosmology ascribes sacred value to specific marine places, species, and practices. Marine spirits (zanahary or tromba) are believed to inhabit certain reefs, mangroves, and channels, and rituals are performed before fishing trips to ensure protection and abundance. Taboos (fady) also structure community behavior, regulating fishing seasons, species targeted, and interactions with sacred sites.

6 Cripps, G. & Gardner, C. J. (2016). *Human migration and marine protected areas: Insights from Vezo fishers in Madagascar*. *Geoforum*, 74, 49–62. <https://kar.kent.ac.uk/84418/1/Cripps%20%26%20Gardner%202016%20Geoforum.pdf>

Violations of these norms are not only socially sanctioned but also perceived to provoke natural imbalances or misfortune. These customary institutions form an important, though often overlooked, foundation for marine stewardship and conflict mediation.

Traditional sea tenure practices, although not formalized in law, delineate fishing areas and gear use, particularly between Vezo and neighboring groups. These systems are being challenged by increased resource pressure, in-migration, and weak formal recognition, yet they continue to guide access and social cohesion within communities.

Rituals such as the fihavanana (kinship-based solidarity) and ceremonies to honor ancestors are often linked to seasonal cycles of marine activity. For example, the launching of new fishing canoes (lakana) is accompanied by blessing ceremonies invoking ancestral protection and collective success. These practices not only affirm cultural identity but also shape rules of reciprocity, conservation, and restraint within fishing communities.

Beyond the Vezo, other ethnic groups such as the Sakalava and Antandroy also maintain marine-related spiritual practices and customary norms, often codified in local Dina and Dinabe.

2.3. Demographic and economic information

(a) Demographic information

The project targets three seascapes that include a mosaic of coastal, marine, and inland ecosystems, inhabited by both sedentary and mobile populations.

The Diana region, located in the far north, has an estimated population of 940,000, with higher densities concentrated in the district of Ambilobe, which alone hosts over 300,000 people. Population is largely distributed along the coastal zones, with clusters around fishing villages and key economic corridors. The region is also subject to growing demographic pressure from internal migration, particularly linked to the expansion of coastal and agricultural activities

The MTB landscape, covering 3.8 million hectares, is home to around 500,000 people, mostly residing along the mangrove corridor and river systems. The population includes both settled agricultural households and seasonal or mobile fishing communities, particularly along the Tsiribihina River and coastal deltas. These migratory dynamics place additional pressure on natural resources and often lead to contestation over access rights and exclusion from local governance processes.

In the Mahafaly landscape, which spans over 700,000 hectares, no precise census figure is available. However, estimates suggest a population of approximately 200,000 to 300,000 inhabitants, based on population densities and land use patterns observed in similar areas. Communities are often scattered in remote coastal and inland villages, with difficult access to infrastructure and services. The Mahafaly landscape is experiencing increased migration from inland drought-affected zones, which intensifies intercommunity tensions and deepens disparities in access to land and resources.

Across all three landscapes, the project does not operate at the regional scale, but rather in selected clusters of communes and villages where LMMAs already exist or are under development.

(b) Economic information

Madagascar remains among the poorest countries globally, with over 80% of the population living below the poverty line as of 2024⁷. The Human Development Index (HDI) stood at 0.49 in 2023, ranking the country 183rd out of 193 nations⁸. Real per capita income is now lower than it was in 1960, and in 2024, gross domestic product (GDP) per capita was just US\$545, among the lowest worldwide⁹.

Across the three project seascapes, local economies are primarily subsistence-based and heavily reliant on natural resources. Communities face limited access to infrastructure, markets, and formal employment, and livelihoods are highly sensitive to environmental variability and external shocks.

Fishing constitutes the main livelihood for most coastal households, with artisanal fishers targeting shrimp, crab, reef fish, and octopus using pirogues and traditional gear. Nationally, more than 250,000 artisanal fishers operate, and the project regions are among the most dependent on marine resources, with fishing providing up to 80% of household income and 99% of animal protein in some southwestern communities. Offshore fishing is dominated by men, while women are more engaged in gleaning activities (e.g., chevrette), processing, and local marketing. Fishing remains largely informal and poorly equipped, with limited access to cold chains or processing infrastructure.

Illegal or destructive practices—such as beach seines and small-mesh nets—have become more common due to increasing pressure on resources. In mangrove-rich zones such as MTB, crabs and shrimp are key value chains, while seaweed farming is emerging in Diana, supported by NGOs and private operators. The collection and trade of coastal products such as octopus and sea cucumbers continue to represent vital income sources, though often outside formal regulatory frameworks.

Agriculture is widely practiced inland and in river delta areas. It is mostly subsistence-based and low-input. Staple crops include rice, maize, cassava, and sweet potatoes. In Mahafaly and parts of MTB, slash-and-burn agriculture is common, driven by land scarcity, migration, and limited access to alternative practices. Women often contribute to weeding, planting, and harvest but rarely control land or production decisions. Most farming in Madagascar is subsistence-based, with limited use of inputs, mechanization, or irrigation. Rice is the staple crop and occupies the largest share of cultivated land. However, productivity is constrained by recurrent droughts, saline intrusion in coastal paddies, and poorly maintained irrigation infrastructure. Studies show that 51% of upland rice farmers were affected by cyclones, 68% by droughts, and 44% by floods between 2009 and 2014¹⁰, and FAO assessments continue to report major disruptions across agricultural areas. Women play a central role in post-harvest processing (drying, salting), local trade, and the management of small-scale commercial activities, including gleaning and shellfish collection. However, they frequently face structural barriers to accessing formal markets, capital, training, and land tenure, particularly in areas where customary norms restrict women's economic autonomy. Gender disparities in income and decision-making authority are particularly pronounced in rural fishing communities.

Charcoal production and fuelwood harvesting are widespread secondary income sources, particularly in Diana and MTB. They are driven by urban demand and poverty, and are often

7 <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099703304212517450#:~:text=In%202024%2C%20Madagascar's%20poverty%20rate,to%2079.5%20percent%20in%202025>.

8 <https://hdr.undp.org/data-center/specific-country-data#/countries/MDG>

9 <https://data.worldbank.org/indicator/NY.GDP.PCAP.CD?locations=MG>

10 IMF (International Monetary Fund). 2022. Republic of Madagascar: Technical Assistance Report-Climate Macroeconomic Assessment Program.

conducted informally. Men typically cut and transport wood, while women may assist in collection and bundling.

Livestock keeping is central to Mahafaly identity and moderately practiced in MTB and Diana. It includes zebu, goats, and poultry, mostly at household scale, with minimal veterinary support or commercialization. Pastoralism is largely male-dominated, while women manage poultry and milk in some communities, which is destined to household needs and local sales. While these activities remain small-scale, local women expressed interest in expanding poultry rearing as a source of income, provided they receive material support.

Mangrove and forest resource use is important for construction wood, medicinal plants, and crab harvesting. These practices are governed by customary norms and vary by gender and group.

Tourism-linked activities remain rare but are emerging in parts of Diana (e.g., Nosy Be, Montagne d'Ambre) and Kimony (MTB). These include informal guiding, craft sales, and rental services, often involving youth or women where tourism is active.

While small-scale, subsistence-based livelihoods predominate, medium and large-scale commercial activities are expanding and increasingly affecting local economies and ecosystems. These include industrial fishing, agro-export plantations, extractive operations, and nascent tourism development. These ventures are often driven by national and international investors and are only weakly integrated into local governance or benefit-sharing systems.

- Diana Region: In Ambilobe, export-oriented plantations supply national and international markets with sugarcane, vanilla, cocoa, cloves, and ylang-ylang, involving smallholder farmers linked to industrial processors. Licensed tuna and shrimp fleets, including foreign vessels, operate offshore, competing with artisanal fishers in the absence of zoning regulations. Ecotourism is growing around Montagne d'Ambre and Nosy Be, but its expansion poses risks of displacement and ecological pressure in unregulated areas.
- Manambolo-Tsiribihina (MTB): Commercial deforestation and charcoal production feed urban markets like Morondava, with supply chains involving commercial intermediaries. Offshore zones are accessed by industrial fishing fleets—national and international—though monitoring remains weak.
- Mahafaly Region: High-value species such as sea cucumbers, shark fins, and turtle products are extracted for export, particularly to Asian markets. Although tourism is limited, early-stage investments in coastal and spiny forest ecotourism are emerging and could expand with improved infrastructure

2.4. Gender

This section provides an overview of gender inequalities and dynamics in Madagascar, with a focus on the specific challenges faced in coastal and rural contexts. It summarizes key findings from the project's Gender Analysis and is complemented by a separate Gender Action Plan, which outlines targeted measures to promote gender equality and mitigate associated risks across all components of the project.

(a) Educational and Health Disparities

Educational attainment remains low across the population, with gender disparities increasing at secondary and tertiary levels. As of 2021, 19.5% of Malagasy women aged 15–49 had received no formal education (vs. 18.7% of men), and 23.9% were illiterate. In regions such as Menabe, the literacy gap between men and women exceeds 25 percentage points. Girls in rural areas face multiple barriers to schooling, including early pregnancy, long travel distances, household responsibilities, and the absence of sanitation facilities. These factors contribute to high dropout rates and reduced opportunities for economic participation or civic engagement.

Access to health services is similarly constrained. Only 46% of births are attended by skilled personnel, and the maternal mortality rate remains high (391 deaths per 100,000 live births in 2020). Rural women face compounded obstacles, including cost, distance, and inadequate infrastructure. Adolescent pregnancy is widespread (31% of girls aged 15–19), and over 14% of women report having experienced sexual violence in their lifetime. While legal protections exist, enforcement remains limited, and reporting rates are low due to stigma and the scarcity of support services.

(b) Economic Inequalities and Gendered Division of Labor

Women in Madagascar are heavily concentrated in informal, low-productivity sectors such as subsistence agriculture, artisanal fisheries, small-scale trade, and unpaid domestic labor. According to UN Women, women represent 58% of self-employed workers and carry out over three times more unpaid care work than men. In the informal sector, they often occupy the most precarious roles, with little access to social protection, credit, or secure land tenure.

Although legislation provides for gender-equal property rights, customary norms continue to restrict women's access to land and inheritance, particularly in southern and western regions. Financial exclusion is also widespread: nearly 41% of women lack access to bank accounts or formal credit mechanisms. These constraints severely limit women's ability to engage in entrepreneurial activities or build resilience to economic and climate-related shocks.

(c) Political Representation and Decision-Making

Women remain significantly underrepresented in political and institutional decision-making. As of 2024, they held only 14.1% of National Assembly seats and 11.1% of Senate seats. In rural areas, their participation in community governance structures such as VOIs, CLBs, or Dina committees is often limited to administrative or symbolic roles, with men continuing to dominate leadership and negotiation processes. Sociocultural norms, low literacy rates, and lack of access to information further restrict women's voice in public affairs, particularly in natural resource governance.

(d) Gender-Based Violence and SEAH Risks

Gender-based violence (GBV) is prevalent across Madagascar, with approximately one in three women reporting intimate partner violence. SEAH risks are particularly acute in remote rural contexts where enforcement of protective laws is weak, and support services are lacking. While Madagascar adopted a national GBV law in 2019, implementation remains limited, and access to justice or psychosocial care is uneven across regions. In the three project seascapes, humanitarian vulnerabilities—linked to climate shocks, food insecurity, and mobility—exacerbate women's exposure to GBV and reduce their ability to seek redress.

(e) Seascape-Specific Gender Dynamics

Across the three target seascapes, the Gender Analysis highlights both common challenges and site-specific dynamics:

- In Diana, women are highly active in seaweed cultivation, gleaning, and agricultural processing but remain excluded from the governance of natural resources. Cultural norms restrict their participation in LMMA management and marine conservation initiatives, despite their substantial role in sustaining fisheries-based livelihoods.
- In Manambolo-Tsiribihina, gendered divisions persist in access to resources and participation in community governance. Fishing households face growing economic pressure, which amplifies women's vulnerability, particularly in relation to access to land, credit, and social recognition. Decision-making remains predominantly male, both within households and at the community level.
- In Mahafaly, women show higher levels of engagement in marine conservation activities, but leadership in local governance remains male-dominated. Women often occupy support roles (secretary, treasurer) rather than positions of strategic influence. Despite emerging signs of empowerment—driven by NGO-led initiatives—sociocultural norms continue to limit their authority in public institutions and resource governance.

3. ENVIRONMENT AND SOCIAL POLICY, REGULATIONS AND GUIDELINES

This chapter first outlines the laws and regulations of Madagascar and the WWF's ESSF and SIPP that are applicable to the project and then discusses gaps between Madagascar laws and regulations and the SIPP. **For the purposes of the Project implementation, the principles and procedures of the ESSF and SIPP shall prevail in all cases of discrepancies.**

3.1. Madagascar Policies, Laws, Regulations Guidelines

This section provides an overview of the national legal framework relevant to the environmental and social management of the project.

(f) Environmental Protection and Biodiversity Conservation

The Constitution of Madagascar (2010) enshrines environmental protection as a core national priority. Several articles establish the duty of the State and local communities to preserve environmental integrity and natural heritage (Articles 37, 95, 141, and 152).

The Environmental Charter (Law No. 2015-003) serves as the overarching legal framework for environmental management. It sets out the principles of prevention, participation, and precaution, and mandates Environmental Impact Assessments (EIAs) for any project likely to affect the environment (Article 13). It also grants citizens the right to access environmental information and participate in decision-making (Article 7).

EIA procedures are governed by Decree No. 99-954 on the Compatibility of Investments with the Environment (MECIE), as amended by Decree No. 2004-167. This decree defines thresholds and categories of projects subject to full EIA or Environmental Commitment Programs (PREE). Sensitive

areas, including protected areas, are covered under Arrêté No. 4355/97, which requires mandatory EIAs for any activity planned in these zones.

(g) Community-Based Natural Resource Management

The legal framework for community-based natural resource management in Madagascar is anchored in Law No. 96-025 of 30 September 1996 (GELOSE), which enables the transfer of management rights for renewable natural resources—such as forests, water bodies, wildlife, and grazing lands—to legally recognized community-based organizations (*communautés de base*). Transfers are formalized through tri-partite agreements between the community, the relevant line ministry, and the commune. These contracts are initially valid for three years, renewable for up to ten years based on performance.

Decree No. 2000-027 of 13 January 2000 further details the legal personality, roles, and eligibility criteria of community-based organizations (CLBs). It mandates that all resource users within the community's territory join the CLB and comply with its by-laws and internal management rules.

In the fisheries sector, Ministerial Order No. 29211/2017 governs the transfer of management rights for aquatic ecosystems and fishery resources. It is based on Law No. 2015-053 on the Fisheries and Aquaculture Code. Transfers are limited to zones with an approved Fisheries Management Plan (*Plan d'Aménagement des Pêcheries – PAP*), a requirement that poses implementation challenges in data-poor areas. Local fisheries management is implemented through simplified management plans and community regulations, including officially endorsed *Dina* and contractual terms defined between the community and the Ministry of Fisheries. The transfer is valid for two years, renewable, and includes obligations such as mangrove restoration, fish restocking, and community surveillance—often supported by NGOs.

Finally, Law No. 2001-004 provides the legal basis for *Dina* (community by-laws), which play a central role in natural resource governance. *Dina* must be adopted through inclusive local consultations and validated by the local court, thereby granting them legal enforceability.

(h) Labor and Working Conditions

Labor conditions in Madagascar are primarily governed by Law No. 2003-044 of 28 July 2004 (Labour Code), which applies to all employment contracts executed in the country, regardless of the nationality or status of the parties. The law sets out rights and obligations for both employers and workers, including provisions for minimum wages, working hours, night work, and occupational safety. The Labour Code requires employers to provide adequate personal protective equipment and to comply with all occupational health and safety standards. It also mandates formal employment contracts to be validated by the labor inspectorate. Finally, Article 85 prohibits women's employment in night-time industrial work, except in family-owned businesses.

Law No. 94-027 of 17 November 1994 (Occupational Health, Safety, and Environment Code) reinforces these provisions. It stipulates access to potable water, sanitary facilities, adequate workspaces, and the systematic monitoring of workplace risks. Employers are responsible for medical and safety services provided to workers exposed to hazardous conditions.

Law No. 94-026 of 17 November 1994 (Social Protection Code) outlines workers' entitlements to social benefits under various employment schemes, emphasizing equal treatment and non-discrimination.

Child labor is regulated under Decree No. 2007-563 of 3 July 2007 and Decree No. 2018-009, which prohibit employment of children under 15 and any form of hazardous or exploitative work for minors under 18. Light work is permitted for children aged 15–17 if it does not compromise health, schooling, or development.

Decree No. 2011-626 of 11 October 2011 addresses HIV/AIDS in the workplace. It requires companies to integrate HIV prevention and support into their occupational health programs and explicitly prohibits workplace discrimination against individuals living with HIV.

Law No. 93-039 of 27 January 1993 on Road Safety regulates the transport of construction materials and equipment by limiting total vehicle weight and ensuring safe loading practices.

(i) Land Acquisition

Land tenure in Madagascar is governed by a tripartite classification defined in Law No. 2005-019 of 17 October 2005, which distinguishes: (i) public lands held by the State and decentralized authorities; (ii) private lands held by individuals or entities; and (iii) land subject to specific legal regimes (e.g. protected areas, forest zones, investment reserves).

Law No. 2006-031 of 24 November 2006 establishes the legal status of untitled private land and introduces the land certificate system (*certificat foncier*), which issuance may be based on long-standing customary occupation that is recognized by the local community. Holders of certified land may legally transfer, lease, or develop their property.

Land Acquisition for public utility is governed by Ordinance No. 62-023 of 19 September 1962 and its implementing Decree No. 63-00 of 16 January 1963. These texts define the procedures by which the State or local governments can acquire private land for public purposes, including compensation and public interest justification requirements.

(j) Gender, Gender-Based Violence, and Sexual Harassment

The Constitution of Madagascar (2010) establishes gender equality as a fundamental right. Article 6 guarantees equal access for men and women to public employment and participation in political, economic, and social life. Additional provisions (Articles 23–28) affirm the principle of non-discrimination in education, employment, and professional training.

Law No. 2019-008 on the prevention and repression of gender-based violence (GBV) constitutes the primary legal instrument for addressing physical, sexual, psychological, and economic violence. It includes provisions on marital rape, harmful traditional practices, and economic coercion, and mandates medical, psychosocial, and legal support services for survivors (Article 14). Decree No. 2022-1219 further specifies implementation modalities, including mandatory reporting (Article 15) and procedures for anonymous disclosure (Article 16).

In the domain of nationality and family rights, Law No. 2016-038 aligns with international standards by allowing Malagasy mothers to transmit nationality to their children on equal terms with fathers, though some gender-discriminatory provisions persist with respect to spouses. Law No. 2007-022 on matrimonial regimes guarantees joint administration of marital property and prohibits unilateral disposal of common assets. Equal inheritance rights for women and men are codified in Law No. 68-012 of 4 July 1968, although in practice, customary norms often prevail in rural areas.

Women's land rights are legally recognized under Ordinance No. 60-146 (1960), amended by Law No. 2003-029, which allows married women to claim rights over property registered in the name of their spouse if acquired fraudulently. While the land tenure system does not formally discriminate,

administrative barriers and customary practices still limit women's access to land ownership and documentation.

Finally, Law No. 2014-040 on combating human trafficking reinforces the legal framework against exploitation and sexual violence. It repeals and replaces Law No. 2007-038, strengthening provisions related to trafficking in persons, especially women and children, and addressing sex tourism. The law criminalizes all forms of human trafficking and mandates penalties for perpetrators, while also providing for victim protection mechanisms.

(k) Community Engagement

The Environmental Charter (Law No. 2015-003) establishes public participation as a fundamental principle in environmental governance. Article 7 guarantees the right of all individuals to access environmental information and to participate in decision-making processes likely to affect the environment. Article 13 mandates that all investment projects with potential environmental impacts undergo an Environmental Impact Assessment (EIA), with community consultation as an integral component.

These provisions are operationalized through Decree No. 99-954 on the Compatibility of Investments with the Environment (MECIE), as amended by Decree No. 2004-167, which outlines procedures for stakeholder engagement during environmental assessments. Public participation must occur in both Malagasy and French and includes structured consultations, disclosure of documentation, and formal channels for community input.

Arrêté No. 6830/2001 further specifies the procedures for public involvement in EIAs. It institutionalizes tools such as public hearings, environmental registers, and participatory evaluation committees, assigning roles and responsibilities to both project developers and affected communities.

In the context of natural resource management, Law No. 96-025 (GELOSE) and Decree No. 2000-027 provide the legal foundation for the transfer of renewable resource management rights to local communities. These texts mandate prior consultation, participatory planning, and local validation of management rules. Community-based organizations (CLBs or VOIs) are legally recognized and hold decision-making authority over resources within their territory under tri-partite contracts with the State and communes.

In the fisheries sector, Ministerial Order No. 29211/2017, based on Law No. 2015-053 (Fisheries and Aquaculture Code), governs the establishment of Locally Managed Marine Areas (LMMAs or APGLs). Transfers of management rights are contingent on the existence of a Fisheries Management Plan (PAP) and require a participatory process involving the preparation of community management plans, legally validated Dina, and negotiated terms of reference between local fisher associations and the Ministry of Fisheries.

Finally, Law No. 2001-004 on Dina (community by-laws) recognizes the legitimacy of local rules adopted through inclusive community assemblies. Once validated by a competent court, these Dina have the force of law and serve as a cornerstone of local governance in both terrestrial and marine resource management.

(l) Cultural resources

The protection of cultural and spiritual heritage in Madagascar is governed by Ordonnance No. 82-029 of 6 November 1982 on the safeguarding and conservation of national heritage. This ordinance

provides the overarching legal framework for the identification, classification, and protection of tangible and intangible cultural assets.

Under this ordinance, any discovery of historical, archaeological, or scientific interest—such as artifacts, ancestral burial grounds, or ancient structures—must be reported to the local authorities within three days. If located on public land, such sites are automatically classified as protected. For discoveries on private land, classification is subject to the owner’s consent; however, in cases of refusal, the State retains the right to expropriate the site in the public interest.

The ordinance also recognizes the importance of traditional rituals in the management of cultural heritage. In particular, the displacement of burial sites must be accompanied by ceremonies equivalent to the famadihana or alafaditra (traditional Malagasy reburial rituals), reflecting the deep spiritual and ancestral connection communities maintain with their land and deceased relatives.

3.2. WWF Safeguards Standards and Procedures Applicable to the Project

WWF’s safeguards standards require that any potentially adverse environmental and social impacts are identified and avoided or mitigated. Safeguards policies that are relevant to this project are as follows.

(m) Standard on Environment and Social Risk Management

This standard is applicable because the Project intends to support activities that result in a variety of environmental and social impacts. The Project is expected to yield positive outcomes such as improved biodiversity conservation, legal recognition of LMMAs, and increased community participation and financing. However, it may also generate adverse impacts, including risks of elite capture, exclusion of vulnerable groups (e.g., women, youth, migrants), tensions around access restrictions, disruption of resource-based livelihoods, and risk of confrontational enforcement practices.

The precise location and impact of specific activities cannot be determined at this stage and will only be known during project implementation. Thus, an ESMF is prepared to set out guidelines and procedures on how to identify, assess and monitor environmental and social impacts, and how to avoid or mitigate adverse impacts. Site-specific ESMPs will be prepared as required, based on principles and guidelines of the ESMF.

(n) Standard on Protection of Natural Habitats

WWF’s mission is to protect natural habitats, and it does not undertake any projects that would result in conversion or degradation of critical natural habitats, especially those that are legally protected, officially proposed for protection, or identified as having high conservation value.

Overall, the Project activities will produce significant benefits including the improved protection and legal recognition of ecologically important habitats such as mangroves, coral reefs, seagrass meadows, and estuarine systems, as well as enhanced local capacity for sustainable ecosystem management. However, localized and low-level risks to natural habitats could arise if certain activities are not carefully managed. These include minor disturbance from the construction of small infrastructure (e.g., LMMA posts or storage units), increased pressure or waste from ecotourism development in sensitive areas, and the potential introduction of non-native species through aquaculture or reforestation efforts.

(o) Standard on Restriction of Access and Resettlement

The WWF's Standard seeks to ensure that adverse social or economic impacts on resource-dependent local communities as a result from restrictions on resource access and/or use are avoided or minimized.

This standard is triggered. The Project aims to strengthen community-based management of coastal and marine ecosystems through the implementation of LMMAs. As part of this process, communities may introduce or formalize access restrictions—such as seasonal closures, gear bans, or exclusion of non-members—based on customary norms and Dina. While these measures are expected to be community-led and negotiated through inclusive processes, they may generate adverse impacts, in particular on vulnerable groups such as migrant fishers, or women dependent on the restricted areas. The specific scope and location of these restrictions will be defined during implementation through participatory planning at each LMMA site.

(p) Standard on Indigenous Peoples

The WWF's standard requires ensuring that indigenous rights are respected, that IPs do not suffer adverse impacts from projects, and that IPs receive culturally appropriate benefits from conservation. The policy mandates that projects respect IPs' rights, including their rights to FPIC processes and to tenure over traditional territories; that culturally appropriate and equitable benefits (including from traditional ecological knowledge) are negotiated and agreed upon with the IPs' communities in question; and that potential adverse impacts are avoided or adequately addressed through a participatory and consultative approach.

This standard is not triggered. No Indigenous Peoples, as defined by WWF's criteria, have been identified within the project area. During field consultations conducted in 2025, no community self-identified as Indigenous, and none of the institutions involved in the safeguard screening process (including WWF Madagascar, MEDD, and the Mihari network) identified the presence of groups requiring the application of this standard. This conclusion is further supported by international reference sources: the International Work Group for Indigenous Affairs (IWGIA) does not include Madagascar in its country profiles or reports on Indigenous Peoples, and no Malagasy communities are listed among globally recognized Indigenous Peoples in their publications.

(q) Standard on Community Health, Safety and Security

This Standard ensures that the health, safety and security of communities are respected and appropriately protected. The Guidance on Labor and Working Conditions requires employers and supervisors to implement all reasonable precautions to protect the health and safety of workers through the introduction of preventive and protective measures. It also requires that the labor rights of project-employed workers are observed, as indicated in Annex 1: Screening Tool. Project activities should also prevent adverse impact involving quality and supply of water to affected communities; SEAH-related risks to both affected communities as well as project staff; safety of project infrastructure, life and properties; protective mechanisms for the use of hazardous materials; disease prevention procedures; and emergency preparedness and response.

This standard is triggered. While the project does not involve armed personnel or operate in conflict zones, several activities may increase community safety and GBV/SEAH risks if not well managed. These include: (i) engagement with diverse actors in contexts of power imbalance; (ii) potential

backlash against women and youth empowered through governance or livelihoods; (iii) support to local patrols who may face threats or retaliation; and (iv) the introduction of new access rules or enforcement of Dina, which could trigger tensions, particularly where marginalized groups feel excluded.

(r) Standard on Pest Management

WWF-funded projects are not allowed to procure or use formulated products that are in World Health Organization (WHO) Classes IA and IB, or formulations of products in Class II, unless there are restrictions that are likely to deny use or access by lay personnel and others without training or proper equipment. The project will follow the recommendations and minimum standards as described in the United Nations Food and Agriculture Organization (FAO) International Code of Conduct on the Distribution and Use of Pesticides and its associated technical guidelines, and procure only pesticides, along with suitable protective and application equipment, that will permit pest management actions to be carried out with well-defined and minimal risk to health, environment, and livelihoods.

This standard is not triggered. The project does not promote the use or procurement of pesticides, whether chemical, biological, or botanical. None of the planned activities (such as mangrove restoration, community-based fisheries management, or sustainable livelihoods) require the application of pest control products.

(s) Standard on Cultural Resources

This Standard ensures that Cultural Resources are appropriately preserved and their destruction, damage or loss is appropriately avoided. Physical cultural resources (PCR) include archaeological, paleontological, historical, architectural, and sacred sites including graveyards, burial sites, of unique natural values. Intangible cultural resources include traditional ecological knowledge, performing arts, oral traditions and expressions, traditional craftsmanship and social practices, rituals and events. The impacts on cultural resources resulting from project activities, including mitigating measures, may not contravene either the recipient country's national legislation or its obligations under relevant international environmental treaties and agreements.

This standard is triggered. While the project seeks to reinforce community-led governance and traditional practices, certain activities may inadvertently affect tangible or intangible cultural resources. These include ecosystem restoration or small-scale infrastructure that could encroach on sacred sites, ancestral tombs, or restricted areas, as well as management changes that may conflict with spiritual norms—particularly in culturally distinct communities like the Vezo.

(t) Standard on Grievance Mechanisms

Project-affected communities and other interested stakeholders may raise a grievance at any time to the PMU and WWF. The PMU will be responsible for informing project-affected parties about the Accountability and Grievance Mechanism. Contact information of the PMU and WWF will be made publicly available. Relevant details are also provided in the Grievance Redress section of this ESMF/PF.

The WWF Standard on Grievance Mechanisms is not intended to replace project- and country-level dispute resolution and redress mechanisms. This mechanism is designed to: address potential breaches of WWF's policies and procedures in a gender-responsive manner; be independent,

transparent, and effective; be survivor-centered and offer protections to those reporting SEAH-related grievances; be accessible to project-affected people; keep complainants abreast of progress of cases brought forward; and maintain records on all cases and issues brought forward for review.

(u) Standard on Public Consultation and Disclosure

This standard requires meaningful consultation with relevant stakeholders, occurring as early as possible and throughout the project cycle. It requires the Project Team to provide relevant information in a timely manner and in a form and language that are understandable and accessible to diverse stakeholders. This standard also requires that information concerning environmental and social issues relevant to the project is disclosed for at least 30 days prior to implementation, and 45 days if the Indigenous Peoples Standard has been triggered. WWF will disclose safeguards documentation on its Safeguards Resources web page. The final safeguards documents should be published on national websites of the Implementing Agencies and made available locally in specific locations. The project is also required to locally release all final key safeguards documents via hardcopy, translated into the local language and in a culturally appropriate manner, to facilitate awareness by relevant stakeholders that the information is in the public domain for review.

(v) Standard on Stakeholder Engagement

This standard ensures that WWF is committed to meaningful, effective and informed stakeholder engagement in the design and implementation of all GEF and GCF projects. WWF's commitment to stakeholder engagement arises from internal standards such as WWF's Project and Program Standards (PPMS), as well as WWF's commitment to international instruments such as United Nations Declaration on Indigenous People (UNDRIP). Stakeholder engagement is an overarching term that encompasses a range of activities and interactions with stakeholders throughout the project cycle and is an essential aspect of good project management. The project has prepared a Stakeholder Engagement Plan that will be implemented during the project.

(w) Guidance Note on Gender-based Violence and Sexual Exploitation, Abuse and Harassment

All over the world, it is estimated that one in three women and girls experience GBV during her lifetime. A recent study conducted by IUCN, in collaboration with USAID as part of Advancing Gender in the Environment (AGENT), states that forms of GBV (ranging from sexual, physical and psychological violence, to trafficking, sexual harassment, sexual coercion and in some cases rape) can be linked to environmental issues.

Many projects implemented by WWF relate to effective management of protected areas and the landscapes in which they are located through support to law enforcement, patrolling and better management and restoration of landscapes by restricting access to natural resources. These activities can potentially give rise to GBV/SEAH risks where government-employed law enforcement officials/rangers/guards supported by the project may misuse the power of their positions by sexually exploiting women in local communities. This is a particular risk if women are collecting water or natural resources in a protected area. As another example, projects that promote alternative livelihoods, particularly ones that improve women's empowerment and decision making, can often lead to changes in power dynamics within communities and increase the risks of GBV/SEAH toward those empowered women.

GBV and SEAH in the implementation of WWF activities in projects and programs is unacceptable and requires timely, proportional, and appropriate action. WWF recognizes that to achieve biodiversity conservation it is vital to promote gender equality and make every effort to ensure that project activities implemented by WWF respect integrity and human rights and mitigate any risk that gives rise to discriminatory and exploitative gender inequalities. WWF does support projects in areas where there is civil war, ethnic conflict, and insurgencies where there are existing GBV/SEAH risks. WWF therefore needs to understand these risks in order to avoid exacerbating local conditions that contribute to GBV/SEAH, which would undermine any conservation outcomes the project may seek to achieve.

For WWF projects, including GEF and GCF projects, under the Standard on Community Health and Security, the project team should identify any potential GBV/SEAH risks by screening proposed project activities using the following questions:

- Is there a risk that the project could pose a greater burden on women by restricting the use, development, and protection of natural resources by women compared with that of men?
- Is there a risk that persons employed by or engaged directly in the project might engage in gender-based violence (including sexual exploitation, sexual abuse, or sexual harassment)?
- Does the project increase the risk of GBV and/or SEAH for women and girls, for example by changing resource use practices?
- Does any mandated training for any individuals associated with the project (including project staff, government park rangers and guards, other park staff, consultants, partner organizations and contractors) cover GBV/SEAH (along with human rights, etc.)?

The identification of GBV/SEAH risks in a project is normally undertaken as part of project preparation and could be conducted during community/stakeholder consultations together with identifying potential risks and screening impacts on vulnerable groups, community health, safety and security, labor and working conditions, gender equality issues, and any other social or environmental risks. Any potential GB V/SE AH risk identified during this stage would be factored into the project's overall social risk, which, in turn, is factored into the overall environmental and social risk associated with a project.

(x) Guidance Note on Labor and Working Conditions

As a conservation organization, WWF does not typically fund large infrastructure activities in conservation projects implemented by WWF's GEF and GCF Agency and therefore does not directly adversely impact labor and working conditions. However, WWF GCF Agency projects do implement projects in the forestry, agriculture and fisheries sectors, which may have potential unintended adverse impacts. This is mostly seen in financing activities necessary for strengthening protected area management systems, including construction of protected area administrative buildings, watch towers, or accommodations for park guards.

In such cases, these activities are usually executed by third party contractors who employ construction workers including sub-contractors. In such cases, WWF will ensure that any funding for such activities complies with WWF's Environment and Social Safeguards Integrated Policies and Procedures (SIPP) and more specifically international labor and working condition standards such as the International Labour Organization's (ILO) Declaration on the Fundamental Principles and Rights at Work and any relevant local labor standards of the project specific countries.

This Guidance Note provides detailed guidance of reasonable precautions to implement in managing principal risks to occupational health and safety. The following is based on the IFC's Environmental, Health, and Safety Guidelines (April 30, 2007), and covers the following general thematic areas:

1. General Facility Design and Operation
 - a. Integrity of Workplace Structures
 - b. Severe Weather and Facility Shutdown
 - c. Workspace and Exit
 - d. Fire Precautions
 - e. Lavatories and Showers
 - f. Potable Water Supply
 - g. Clean Eating Area
 - h. Lighting
 - i. Safe Access
 - j. First Aid
 - k. Air Supply
 - l. Work Environment Temperature
2. Training
 - a. Occupational Health and Safety (OHS) Training
3. Physical Hazards
 - a. Rotating and Moving Equipment
 - b. Rotating and Moving Equipment
 - c. Vibration
 - d. Electrical
 - e. Eye Hazards
 - f. Welding / Hot Work
 - g. Industrial Vehicle Driving and Site Traffic
 - h. Working Environment Temperature
 - i. Ergonomics, Repetitive Motion, Manual Handling
 - j. Working at Heights
 - k. Illumination
4. Standards for Workers Living Conditions
 - a. General living facilities
 - b. Drainage
 - c. Heating, air conditioning, ventilation and light
 - d. Water
 - e. Wastewater and solid waste
 - f. Rooms/dormitories facilities
 - g. Bed arrangements and storage facilities
 - h. Sanitary and toilet facilities
 - i. Toilet facilities
 - j. Showers/bathrooms and other sanitary facilities
 - k. Canteen, cooking and laundry facilities
 - l. Medical facilities
 - m. Leisure, social and telecommunications facilities

(y) Guidance Note on Ranger Principles

Rangers play a key role in protecting wildlife, managing protected areas, and resolving human-wildlife conflict. Rangers must act within the law and under high ethical standards in order to achieve

positive outcomes from both people and nature. WWF only supports legitimate law enforcement activities that are carried out in a way that respects and protects the human rights of local communities and Indigenous Peoples. Certain measures are in place to uphold WWF's high ethical standards, including a risk assessment, mitigation actions, and continuous monitoring throughout implementation.¹¹ Rangers are expected to adhere to the following principles:

1. Act within the law.
2. Ensure accountability.
3. Build ranger capacity
4. Support the welfare of rangers and their families.
5. Partner with local communities.
6. Identify, monitor and plan for challenges.
7. Maintain impartiality.
8. Communicate regularly.
9. Sanctions for malfeasance.

3.3. Gaps between Madagascar laws and policies and the WWF's SIPP

This section identifies the gaps between Madagascar's legal framework and the WWF's ESSF and SIPP. **For the purposes of the project, the provisions of the WWF's ESSF and SIPP shall prevail over Madagascar legislation in all cases of discrepancy.**

(a) Environmental Protection and Biodiversity Conservation

Law No. 2015-003 (Environmental Charter) establishes the principles of prevention, participation, and precaution, and mandates Environmental Impact Assessments (EIAs) for projects with potential environmental impacts. The MECIE Decree (No. 99-954, amended by 2004-167) defines EIA thresholds and procedures, with additional provisions for sensitive areas under Arrêté No. 4355/97.

WWF requires systematic environmental assessments for all activities with potential impacts, with clear principles of no net loss (or net positive impact) for biodiversity and strict protection of critical habitats, including legally recognized, proposed, or de facto protected areas.

While Madagascar's framework mandates EIAs, it lacks explicit requirements for biodiversity offsets, systematic post-project ecological monitoring, and integration of conservation goals into all development sectors. WWF's approach is more stringent and impact-oriented.

(b) Labor and Working Conditions

The Labor Code (Law No. 2003-044), supported by Law No. 94-027 (Occupational Health, Safety and Environment), Law No. 94-026 (Social Protection), and child labor decrees (2007-563 and 2018-009), provides a robust legal basis for worker protection. However, enforcement is weak in remote and informal sectors.

WWF aligns with International Labour Organization (ILO) conventions and requires clear standards on worker health and safety, prevention of child and forced labor, formal contracts, and appropriate accommodation for workers (based on IFC EHS Guidelines).

¹¹ See [Ranger Principles document](#) for more details.

National laws are broadly aligned with WWF principles, but implementation and enforcement remain weak, especially in rural areas. WWF also requires more systematic monitoring, worker grievance procedures, and compliance with international labor standards.

(c) Land Acquisition

Law No. 2005-019 categorizes land as public, private, or under special regimes. Law No. 2006-031 allows households to secure land tenure through certificates (*certificat foncier*), which can be based on long-standing customary occupation. Ordinance No. 62-023 of 19 September 1962 and Decree No. 63-000 of 16 January 1963 regulate land expropriation for public utility.

WWF requires that land-related impacts be addressed through transparent and inclusive processes that recognize legitimate tenure rights, including customary systems. WWF also requires meaningful consultation with all affected persons and the provision of fair and equitable compensation—both monetary and non-monetary—for any adverse impacts. Where Indigenous Peoples are present, Free, Prior and Informed Consent (FPIC) is mandatory (SIPP, Standard on Restriction of Access and Resettlement, and Indigenous Peoples Standard).

While Madagascar's laws recognize customary occupation through "*certificat foncier*" and regulate land acquisition for public utility, they do not systematically require participatory planning, non-monetary compensation, or formal recognition of customary rights outside the certification process. Additionally, there are limited safeguards for non-titled or marginalized land users, particularly in the context of conservation-related restrictions. As a result, vulnerable groups such as migrant fishers, women, or seasonal users may lack adequate protection or compensation mechanisms under national law.

(d) Gender, Gender-Based Violence, and Sexual Harassment (SEAH)

Madagascar's Constitution guarantees gender equality (Articles 6, 23–28). Key legislation includes Law No. 2019-008 on GBV, Law No. 2014-040 on trafficking in persons, and family/property laws (e.g., Law No. 2007-022 on matrimonial rights, Law No. 68-012 on inheritance). However, implementation remains limited, particularly in rural areas.

WWF requires the application of a gender equality principle across all operations, mandatory screening for GBV/SEAH risks, gender-responsive project design, and survivor-centered grievance and referral mechanisms.

National laws provide legal coverage but are not fully operationalized on the ground. SEAH prevention protocols, training, and reporting systems are rare. WWF imposes stronger standards on risk identification, mitigation, and gender-inclusive planning and monitoring.

(e) Community Engagement

The Environmental Charter and MECIE Decree require community participation in EIA processes. Arrêté No. 6830/2001 provides guidelines for public consultation through hearings and written feedback. In natural resource governance, community-based systems are legally recognized through the GELOSE framework, TGRN contracts and Dina agreements.

WWF mandates meaningful and inclusive engagement throughout the project cycle, with materials disclosed in local languages, culturally appropriate formats, and accessible to all—including women, migrants, and marginalized groups. Formal grievance mechanisms are also required.

National procedures ensure baseline participation but do not guarantee meaningful engagement of vulnerable groups. Grievance mechanisms are not consistently functional or accessible. WWF's safeguards require higher levels of disclosure, accessibility, and inclusion.

(f) Cultural Resources

Ordinance No. 82-029 protects tangible heritage (e.g., archaeological sites, tombs) and requires rituals when sacred sites are relocated. However, it lacks comprehensive provisions for intangible heritage (e.g., taboos, spiritual knowledge).

WWF explicitly protects both tangible and intangible cultural resources, including traditional ecological knowledge and sacred sites. Activities must be adapted to local beliefs and be informed by culturally appropriate consultations.

National law focuses largely on material heritage and does not address customary marine governance or intangible values, such as those held by Vezo or Sakalava communities. WWF's approach is more holistic and participatory in addressing cultural risks.

4. ANTICIPATED ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATION MEASURES

4.1. Adverse Environmental Impacts

This section outlines the potential adverse environmental impacts associated with project activities. While the overall design promotes biodiversity conservation and community-based natural resource management, certain environmental risks may nonetheless arise during implementation—particularly in connection with field-based interventions under Component 3.

(a) Adverse Environmental Impacts of Component 1

This component is primarily focused on upstream legal, policy, and institutional reform to support community-based marine resource governance. The activities themselves are designed to enhance biodiversity conservation and sustainable resource use. However, some activities may involve field missions—particularly for marine spatial planning (MSP), the recognition of OECMs, and actions targeting illegal marine species trade—which could result in localized disturbance to natural habitats. These impacts remain minor and reversible (e.g., trampling of vegetation, temporary clearing for access, alteration of mangrove substrates, packaging waste) but may affect sensitive ecosystems such as coastal wetlands or coral reef areas. Specific field protocols will be required to ensure minimal ecological disturbance during data collection or site visits.

(b) Adverse Environmental Impacts of Component 2

Component 2 centers on the design and operationalization of sustainable financing mechanisms for LMMAs, largely through technical assistance, diagnostics, and financial system development. Environmental impacts are therefore limited. However, low-level risks may arise from field visits required for assessments and due diligence in LMMA sites, potentially causing minor disturbance to coastal habitats (e.g., vegetation trampling or wildlife disturbance). Additionally, any fund

disbursement mechanism must be governed by an Environmental and Social Management System (ESMS) to ensure downstream-financed activities do not generate adverse environmental impacts. The ESMS will be critical for integrating safeguards into subgrants or investment pipelines.

(c) Adverse Environmental Impacts of Component 3

Component 3 introduces site-level implementation of LMMA management. Several activities carry environmental risks if not properly designed or mitigated.

Ecological diagnostics, baseline studies, and monitoring activities may cause localized disturbance to habitats like mangroves and seagrass beds through trampling, sampling, or equipment deployment. Community patrols, while intended to enhance protection, may increase boat traffic in ecologically sensitive areas, leading to anchor damage, wake erosion, or disturbance to marine fauna, especially during critical life stages.

Livelihood activities may also pose environmental risks that depend on the type of activities undertaken, as each activity may be associated with specific environmental impacts. While these impacts are generally moderate to low and reversible, they must be addressed in site-level ESMPs to prevent degradation of targeted ecosystems.

Agroforestry for charcoal production: Risks include loss of natural vegetation if implemented on wooded land, spread of invasive species from fast-growing trees, and air pollution from traditional carbonization methods. These impacts are moderate to low if mitigated through site selection, use of native species, technical supervision, and improved kilns.

Seaweed farming: Potential impacts include disturbance of benthic habitats during the installation of culture structures, uncontrolled spread of cultivated species (especially if non-native), and localized eutrophication from decomposing biomass. These risks require careful site selection and ecological monitoring.

Aquaculture (in excavated ponds): Environmental risks include organic pollution from uneaten feed and waste, eutrophication, potential pathogen buildup, and environmental degradation from poorly located or inappropriately excavated ponds. If non-native species are used, there is also a risk of accidental release and ecological imbalance.

Cold chain infrastructure: Construction may lead to vegetation clearing, soil compaction, and erosion. Processing and storage of marine products can generate solid and organic waste. Energy use for freezers (typically diesel) and water consumption for cleaning or ice production may also stress local resources.

Micro-enterprise development: Without safeguards, these may lead to unsustainable extraction of natural resources (e.g., timber, sand, marine species), or pollution from new production units (e.g., packaging, wastewater). Waste management systems will be essential to mitigate these risks.

(d) Adverse Environmental Impacts of Component 4

Component 4 is largely institutional and carries minimal environmental risks. However, participatory consultations, peer exchanges, and advocacy events may involve travel to ecologically sensitive sites. If not carefully planned, these activities could cause minor disturbance to habitats (e.g., mangroves, nesting areas) and generate solid waste (e.g., plastic, food packaging). These risks can be easily mitigated through standard environmental protocols.

(e) Adverse Environmental Impacts of Component 5

Component 5 consists mainly of institutional and reporting activities. However, supervision missions or field data collection could result in low-level environmental impacts such as trampling, disturbance to wildlife, or minor waste generation (e.g., plastic bottles). These impacts are easily mitigated with basic field protocols and low-impact procedures.

4.2. Environmental Mitigation Measures

The following table presents the proposed mitigation measures for each adverse environmental impact identified under the project. For Components 1, 4, and 5, where only low-level risks are anticipated, the development and implementation of concise environmental protocols will be sufficient. For Component 2, a more robust approach will be required, as the LMMA funding mechanism must be supported by an Environmental and Social Management System (ESMS). Finally, for Component 3, which includes a range of site-level activities with varying levels of environmental risk, each activity will need to be screened. Where relevant, a site-specific Environmental and Social Management Plan (ESMP) should be developed, integrating at minimum the mitigation measures proposed in the table below.

Table 1. Anticipated Environmental Impacts and Mitigation Measures

Project Activity	Potential impact	Proposed mitigation measures	Responsible party
Component 1			
Field missions for MSP, OECM recognition, and anti-illegal trade efforts	Minor disturbance to natural habitats (e.g., trampling, vegetation clearing, packaging waste)	Develop a low-impact field protocol to be applied by all field teams. This should include the avoidance of ecologically sensitive areas, the scheduling of visits outside critical periods, and the integration of waste management.	Developed by MEDD and WWF - applied by field teams
Component 2			
Field assessments and due diligence for LMMA financing	Minor disturbance to natural habitats	Develop a low-impact field protocol to be applied by all field teams.	Developed by MEDD and WWF - applied by field teams
Sustainable finance mechanisms for LMMAs	Potential adverse environmental impacts of downstream activities	Develop and implement an ESMS for the LMMA funding mechanism to screen, assess, and mitigate environmental risks	FAPBM, Tany Meva
Component 3			
Field missions for ecological diagnostics and monitoring activities / Increased human presence and boat traffic related to community patrols	Disturbance to natural habitats (e.g., trampling, vegetation clearing, packaging waste, wake erosion, anchor damage, or noise-related stress).	Develop a low-impact field protocol to be applied by all field teams. Develop a specific a low-impact field protocol to be applied by community patrols	Developed by MEDD and WWF - applied by field teams

Project Activity	Potential impact	Proposed mitigation measures	Responsible party
Agroforestry for charcoal production	Loss of natural vegetation; spread of invasive species; emissions of fine particles and CO ₂ if low-efficiency kilns are used.	Select degraded sites; use native species; introduce improved kilns and provide community training.	Executing partners and LMMA Committees
Seaweed farming	Disturbance of benthic habitats; organic pollution from decomposing biomass; spread of non-native species.	Avoid ecologically sensitive areas; monitor biomass levels; enforce proper harvesting and maintenance schedules.	Executing partners and LMMA Committees
Aquaculture (excavated ponds)	Organic pollution from excess feed, sediment accumulation, pathogen proliferation; risk of non-native species escape; environmental degradation from poorly located or inappropriately excavated ponds.	Use native species; implement proper waste and water management systems; apply biosecurity protocols; require site screening and validation prior to excavation; use manual or low-impact mechanical methods suited to soil type and slope.	Executing partners and LMMA Committees
Cold chain infrastructure (construction of storage units, installation of freezers, etc.)	Vegetation clearing, soil compaction, waste generation (during construction and operation), high energy and water use.	Avoid ecologically sensitive areas; include environmental requirements in contractor agreements; require waste management plan for construction and operation phases; select energy-efficient equipment.	Executing partners and LMMA Committees
Micro-enterprise development	Unsustainable resource extraction; solid and liquid waste pollution.	Include environmental requirements in business agreements; train supported enterprises on sustainable practices and waste management.	Executing partners and LMMA Committees
Component 4			
Events for exchanges and/or advocacy	Disturbance to natural habitats; solid waste generation (e.g., food packaging, plastic)	Develop an event-specific environmental protocol (including waste minimization and post-event clean-up) to be applied by event-organizers	Developed by MEDD and WWF- applied by event- organizers
Component 5			
Field data collection and supervision missions	Minor disturbance to natural habitats	Develop a low-impact field protocol to be applied by all field teams.	Developed by MEDD and WWF- applied by field teams

4.3. Adverse Social Impacts

This section outlines the potential adverse social impacts associated with each project component. While the overall design prioritizes inclusion, equity, and transparency, a range of risks may arise during implementation—particularly under Component 3.

(a) Adverse Social Impacts of Component 1

Component 1 focuses on upstream legal, institutional, and policy reform to strengthen LMMA governance. Despite its normative nature, it carries social risks if consultations and participatory processes are not designed inclusively.

Activities related to legal framework reviews, MSP processes, and the designation of OECMs may marginalize vulnerable groups—such as women, youth, migrants—if their participation is not actively facilitated. Inadequate representation in decision-making forums may reinforce existing inequities, elite capture, or misalignment with customary norms.

Similarly, training and capacity-building activities may benefit already-connected stakeholders if participant selection is not gender-responsive, socially inclusive or sensitive to disparities in education and location. Centralized access to opportunities may further widen the gap between formal and informal actors.

(b) Adverse Social Impacts of Component 2

Component 2 aims to develop sustainable financing mechanisms for LMMAs. While largely institutional, it presents notable risks of exclusion and inequity.

Training and peer exchange opportunities may be dominated by well-established organizations, sidelining smaller or less formal LMMA groups. Selection biases may further exclude women, youth, or remote actors. Due diligence visits may also generate frustration in non-selected communities due to raised expectations.

Additionally, any fund disbursement mechanism must be governed by an Environmental and Social Management System (ESMS) to ensure downstream-financed activities do not generate adverse social impacts. ESMS mechanisms must therefore ensure that equity, accountability, and social risk mitigation are embedded from the outset.

(c) Adverse Social Impacts of Component 3

Component 3 supports community-level LMMA implementation and sustainable livelihoods, with a focus on inclusion and resilience. However, it presents several significant social risks.

Social Exclusion and Elite Capture: Local governance bodies are perceived as dominated by influential families or customary elites, and by males, leading to the exclusion of women, youth, migrants, and minority lineages from decision-making over resource management and from benefit-sharing related to project-supported livelihood activities. Field consultations confirmed that despite their active reliance on natural resources, these groups are often underrepresented in governance structures. This structural exclusion fuels social tensions and may undermine the legitimacy and sustainability of LMMA governance if not proactively addressed.

Access Restrictions and Livelihood Disruption: The reinforcement of community-defined rules—such as seasonal closures, gear bans, or access limitations to sensitive sites—may result in the loss of access to natural resources for certain groups, particularly migrant fishers, women, and individuals not formally included in local governance structures. These users often have limited influence over decision-making and may lack viable alternatives. Without safeguards,

compensation, or support to diversify income sources, such restrictions may disproportionately impact already vulnerable households.

Social Tensions and Retaliation Linked to Local Enforcement: The project's support to LMMA patrols may generate social tensions if not carefully managed. On the one hand, patrollers themselves may face threats, retaliation, or social isolation, in contexts where enforcement can be perceived as arbitrary or lacking legitimacy. On the other hand, individuals targeted by enforcement actions may be subject to disproportionate sanctions or abuse of power—especially if they belong to vulnerable groups such as women, migrants, or youth. In the absence of clear protocols, enforcement actions may escalate conflicts or reinforce local power imbalances.

GBV and SEAH Risks: The engagement with a wide range of actors—such as consultants, NGOs, and other partners—may expose women to unequal power dynamics that heighten their vulnerability to GBV/SEAH. Second, the empowerment of women and youth through leadership roles or income-generating activities may provoke social backlash or retaliation in communities where such shifts challenge traditional hierarchies. Finally, the reinforcement of community patrol could increase the risk of abuse of power, including toward women.

Child Labor Risks: In rural coastal areas where children are already involved in fishing-related tasks, interventions such as aquaculture, fisheries value chain development, or community-led ecological restoration may incentivize unintentionally further participation of children in income-generating work. In addition, access restrictions—such as seasonal closures or gear bans—may temporarily reduce household income, leading families to rely more heavily on children's labor or to withdraw them from school due to associated costs.

Labor and Working Conditions Risks: Activities involving mangrove restoration or the construction and installation of small-scale infrastructure may expose workers to labor risks, such as unfair remuneration, inadequate working hours, inadequate protective equipment, unsafe handling of materials, exposure to heat or chemicals, and risk of injury from falls or lifting heavy loads.

Cultural Resources: Livelihood and ecosystem restoration activities may unintentionally infringe on sacred sites or taboo zones. Without prior mapping and community consultation, infrastructure or fishing practice changes may disrupt spiritual norms.

(d) Adverse Social Impacts of Component 4

Component 4 is centered on communication and knowledge sharing. While the activities are largely institutional, they may produce unintended social effects if not handled with care. Peer-to-peer exchanges and national forums may reinforce inequities if marginalized groups face barriers to participation (e.g., travel, language, literacy). If safeguarding protocols are not in place, women or youth traveling for events may face exposure to SEAH risks. Data privacy concerns also arise in the management of traditional knowledge and community narratives. Improper consent, benefit-sharing, or anonymization during content production (e.g., videos, testimonies) could lead to reputational harm or exploitation.

(e) Adverse Social Impacts of Component 5

Component 5 involves project monitoring and evaluation (M&E). Although administrative in nature, its processes may carry social risks if poorly managed. Workshops and steering mechanisms may exclude marginalized voices if logistical or cultural barriers are not addressed. Surveys or consultations may raise concerns about data confidentiality, raise false expectations, or trigger consultation fatigue. If M&E tools do not capture disaggregated data, they risk overlooking differentiated impacts on women, youth, or migrants—thereby reducing the project's capacity to adjust course or ensure equitable outcomes.

4.4. Social Mitigation Measures

The following table presents the proposed mitigation measures for each adverse social impact identified under the project. For Components 1, 4, and 5, where risks primarily relate to social exclusion in institutional or consultative processes, the application of the SEP and the GAP, will be sufficient. For Component 2, in addition to applying the SEP and GAP, an ESMS will need to be developed and applied to the LMMA funding mechanism to ensure equitable access. Finally, for Component 3,

where more complex, site-level risks are expected—including, livelihood loss, retaliation, GBV/SEAH, and labor-related risks—project teams will need to screen each activity and implement adapted social risk mitigation measures. Where appropriate, additional site-specific actions should be included in Environmental and Social Management Plans (ESMPs), building on the measures listed in the table below.

Table 2. Anticipated Social Impacts and Mitigation Measures

Project Activity	Potential impact	Proposed mitigation measures	Responsible party
Component 1			
Legal framework review, MSP planning, OECM designation	Exclusion of vulnerable groups (e.g. women, migrants, youth); reinforcement of elite capture in decision-making processes	Follow the guidance of the SEP and the GAP to ensure the effective participation of vulnerable groups in consultations and working groups	PMU staff, executing partners and other organizers of the consultation activities
Capacity-building, creation of a pool of young experts	Unequal access to training opportunities; exclusion of vulnerable groups	Follow the guidance of the SEP and the GAP to ensure transparent and inclusive participant selection, with attention to gender and social equity.	PMU staff, executing partners and other organizers of the training activities
Component 2			
Definition of a funding mechanism / Community-based monitoring	Exclusion of vulnerable groups (e.g. women, migrants, youth), reinforcement of elite capture in decision-making processes	Follow the guidance of the SEP and the GAP to ensure the effective participation of vulnerable groups in consultations and working groups	PMU staff, executing partners and other organizers of the consultation activities
Capacity building for LMMA communities	Unequal access to training opportunities, exclusion of vulnerable groups	Follow the guidance of the SEP and the GAP to ensure transparent and inclusive participant selection, with attention to gender and social equity.	PMU staff, executing partners and other organizers of the training activities

Project Activity	Potential impact	Proposed mitigation measures	Responsible party
Sustainable finance mechanisms for LMMAs	Discrimination based on eligibility criteria, potential adverse social impacts of downstream activities	Develop and implement an ESMS for the LMMA funding mechanism to screen, assess, and mitigate social risks	FAPBM, Tany Meva with support from PMU Gender and Safeguards Specialist
Component 3			
TGRN/TGRH contract negotiations	Elite capture; underrepresentation of vulnerable groups in decision-making	Follow the guidance of the SEP and the GAP to ensure the effective participation of vulnerable groups in consultations and governance bodies	Executing partners and LMMA Committees
Implementation of community rules (closures, gear bans)	Access restriction to natural resources and resulting livelihood disruption	Follow the guidance of the Process Framework to ensure transparent rule-setting; assess potential livelihood impacts; and define compensatory or support measures as needed	Executing partners and LMMA Committees with support from PMU Gender and Safeguards Specialist
Support to community patrols	Threats or retaliation against patrollers; abuse of power against sanctioned individuals	Develop and adopt enforcement protocols; provide training for community patrollers; disclose and implement the project grievance mechanism, require patrol members to sign a code of conduct	Executing partners and LMMA Committees with support from PMU Gender and Safeguards Specialist and other relevant PMU staff
Interaction with consultants, NGOs, and other executing partners	Risk of GBV/SEAH	Follow the SEAH Risk Mitigation Guidance of the ESMF and the Guidance of the GAP to mitigate backlash risks; disclose and implement the project grievance mechanism, require staff to sign a code of conduct	PMU Staff, executing partners and LMMA Committees
Community engagement and leadership for women/youth	Backlash or retaliation against empowered women or youth in leadership or income roles	Follow the SEAH Risk Mitigation Guidance of the ESMF and the Guidance of the GAP to mitigate backlash risks; disclose and implement the project grievance mechanism	PMU Staff, executing partners and LMMA Committees

Project Activity	Potential impact	Proposed mitigation measures	Responsible party
Development of livelihood-based activities (including mangrove restoration)	Unequal access to project benefits; exclusion of vulnerable groups	Follow the guidance of the SEP and the GAP to ensure transparent and inclusive participant selection, with attention to gender and social equity.	Executing partners and LMMA Committees
Development of livelihood-based activities (including mangrove restoration)	Increased reliance on child labor due to household labor demands or income shocks	Include social requirements in community agreements related to livelihood activities; raise awareness on child protection; monitor labor patterns in supported households	Executing partners and LMMA Committees
Mangrove restoration, construction and installation of small-scale infrastructure	Poor labor conditions, including OHS risks, informal labor, or underpayment	Include social requirements in contractor and community agreements; monitor working hours, wages, recruitment, and OHS standards	Executing partners, LMMA Committees and contractors
Restoration or infrastructure activities near cultural sites	Disruption of sacred or taboo areas; erosion of cultural values or spiritual norms	Identify and map culturally sensitive sites prior to implementation in consultation with local elders and leaders; develop and apply a chance find procedure	Executing partners and LMMA Committees
Component 4			
Peer-to-peer learning exchanges and advocacy events	Barriers to participation of vulnerable groups; exposure to SEAH during travel or events	Follow the guidance of the SEP and the GAP to ensure transparent and inclusive participant selection with attention to gender and social equity; follow the SEAH Risk Mitigation Guidance of the ESMF to ensure safeguards during travel and event implementation	Event organizers
Collection and dissemination of community narratives	Privacy violations; reputational risks; misuse of traditional knowledge	Develop a data privacy protocol, including secure procedures for informed consent, confidentiality safeguards, and appropriate handling of traditional knowledge	Developed by MEDD, PMU Staff and WWF - applied by field teams
Component 5			

Project Activity	Potential impact	Proposed mitigation measures	Responsible party
Consultations, surveys, monitoring and evaluation activities	Exclusion of vulnerable groups (e.g. women, migrants, youth) from feedback loops; consultation fatigue; confidentiality concerns	Follow the guidance of the SEP and GAP to ensure accessibility for vulnerable groups in monitoring processes; disaggregate M&E data at least by gender; develop a data privacy protocol, including secure informed consent procedures and data confidentiality measures	Executing partners and Project M&E Unit with support from PMU Gender and Safeguards Specialist

4.5. Process Framework: Livelihood Restoration Measures

The development and implementation of site-specific LMMA management plans under this project are expected to strengthen local conservation and resource governance. However, these plans may also result in new or reinforced restrictions on community access to natural resources that are essential for subsistence, cultural practices, and income-generating activities. Such restrictions may include seasonal or permanent no-take zones, gear bans, regulated harvesting of mangroves or other natural products. Although these measures will be rooted in participatory processes and local customs, they may nonetheless generate unintended social impacts, particularly for groups already facing structural exclusion, such as women, youth, migrant fishers, and households outside formal local management structures.

If not carefully managed, access restrictions could lead to short-term income losses, food insecurity, or an erosion of trust in governance institutions. In some sites, community cohesion may also be undermined if benefits and restrictions are perceived as unevenly distributed. To ensure that conservation efforts do not inadvertently compromise the rights or well-being of local stakeholders, the project will apply a Process Framework, consistent with WWF's Environmental and Social Safeguards Policies.

Any change of land use, sea use, or new zonation must be preceded by free, prior and informed consultations with affected communities and relevant local authorities. Where restrictions are deemed necessary, the project will design and implement appropriate livelihood support measures for all households negatively affected by the changes. This process will be structured around the following five steps:

(a) Screening

The screening phase aims to identify areas and activities where the implementation of new rules or management measures could lead to livelihood impacts.

- This includes all sites targeted for the establishment or renewal of TGRN or TGRH contracts, as well as areas subject to local rule-making around marine closures, gear restrictions, or harvesting regulations.
- Project teams will work with local governance bodies (VOI/CLB), LMMA promoters, and relevant authorities (e.g., DirPEB) to map zones and communities where restrictions could apply.
- Special attention will be given to informal, mobile, or migrant users—whose rights may not be formally recognized but whose livelihoods may depend heavily on the targeted areas.

Public consultations will be conducted to ensure that community members are fully informed of anticipated changes, including their rationale (e.g., biodiversity recovery, fish stock regeneration), expected benefits, and possible implications. Communication materials will be adapted to the literacy levels and languages of the communities, with specific outreach to women, youth, and migrants.

(b) Social Assessment

Once potential impact zones and user groups have been identified, a social assessment will be carried out in each relevant site to analyze dependency on the affected resources and identify Project-Affected Persons (PAPs). This assessment will serve as the basis for targeted livelihood support planning.

The assessment will include:

- Household-level data collection on income sources, subsistence activities, and cultural ties to natural resources;
- Seasonal calendars and patterns of resource use by different groups (including women and migrants);
- Mapping of customary access rights and recognition of informal use patterns;
- Analysis of power dynamics, representation, and the legitimacy of local governance structures;
- Identification of vulnerable or marginalized groups at risk of being excluded from decision-making or benefits.

All individuals or households experiencing reduced access to resources critical to their livelihood as a direct result of project-supported rules will be considered eligible for support under the Process Framework. Eligibility will be based on a combination of geographic proximity, customary use, and demonstrated economic reliance—regardless of formal registration status.

(c) Elaboration of Livelihood Restoration Plans (LRPs)

For each site or group where access restrictions are expected to have a significant impact, a LRP will be developed in consultation with PAPs and local stakeholders. These plans will be tailored to local needs and will reflect the nature and scale of the restrictions.

To ensure inclusive planning:

- Each LRP will be co-developed through a community committee that includes representatives of all stakeholder groups—VOI/CLB, women's associations, youth, migrant users, and customary authorities.
- The process will be facilitated by LMMA promoters or executing partners and supported by technical staff from the project team.

LRPs will contain two categories of measures:

- **Mitigation Measures** – designed to allow continued sustainable use of natural resources under revised conditions. These may include:
 - Designation of areas for regulated fuelwood collection or NTFP harvesting;
 - Access agreements for traditional medicinal plants;
 - Creation of temporary access windows (e.g., for rituals or seasonal harvests);
 - Development of local enforcement rules and participatory monitoring.

Mitigation measures will be governed by Dina or equivalent local agreements, and enforced through existing governance structures. They will seek to minimize disruption by maintaining access where ecologically and socially feasible.

- **Compensation Measures** – to be applied when access loss cannot be adequately mitigated. Compensation may be:
 - In-kind support (tools, inputs, infrastructure) for alternative activities (e.g., seaweed farming, aquaculture, poultry, beekeeping);
 - Vocational training or financial literacy programs;
 - Access to microcredit or community savings groups;

- Small-scale infrastructure that supports livelihoods (e.g., water points, storage facilities, cold chain access).

Measures must be inclusive, realistic, and tailored to community contexts. Priority will be given to women-headed households, low-income families, and those with limited alternative options.

(d) Validation and Disclosure of LRPs

Once LRPs are developed, they will be subject to local validation through a transparent approval process involving:

- Project-Affected Persons (PAPs);
- Local authorities (fokontany, municipalities);
- LMMA governance bodies (VOI/CLB);
- LMMA promoters and executing partners.

Each plan will be summarized in plain language and disclosed locally via community meetings and notice boards. Details will include eligibility criteria, selected support measures, implementation timelines, and contact points for grievance redress.

(e) Monitoring and Grievance Redress

The implementation of the Process Framework and all LRPs will be monitored through the project's M&E system. Monitoring indicators will include:

- Number of PAPs identified and supported;
- Type and number of support measures implemented;
- Beneficiary satisfaction and feedback;
- Adjustments made in response to grievances or monitoring data.

Affected communities will be informed on how to access the Grievance Redress Mechanism (GRM) described in Section 5.9 of this ESMF. All grievances—including those related to eligibility, access loss, or dissatisfaction with support—will be addressed promptly and fairly. Sensitive grievances, including those related to SEAH, will be treated confidentially.

5. IMPLEMENTATION ARRANGEMENTS

5.1. Procedures for the Identification and Management of Environmental and Social Impacts

The following is an exclusion list of activities will not be financed by the project. This includes activities that:

1. Lead to land management practices that cause degradation (biological or physical) of the soil and water. Examples include, but are not limited to: the felling of trees in core zones and critical watersheds; activities involving quarrying and mining; commercial logging; or dredge fishing.
2. Negatively affect areas of critical natural habitats or breeding ground of known rare/endangered species.

3. Significantly increase GHG emissions.
4. Use genetically modified organisms or modern biotechnologies or their products.
5. Involve the procurement and/or use of pesticides and other chemicals specified as persistent organic pollutants under the Stockholm Convention or within categories IA, IB, or II by the World Health Organization.
6. Develop forest plantations.
7. Result in the loss of biodiversity, alteration of the functioning of ecosystems, and introduction of new invasive alien species.
8. Involve the procurement or use of weapons and munitions or fund military activities.
9. Lead to private land acquisition and/or physical displacement and voluntary or involuntary relocation of people, including non-titled and migrant people.
10. Contribute to exacerbating any inequality or gender gap that may exist.
11. Involve illegal child labor, forced labor, sexual exploitation or other forms of exploitation.
12. Adversely affect indigenous peoples' rights, lands, natural resources, territories, livelihoods, knowledge, social fabric, traditions, governance systems, and culture or heritage (physical and non-physical or intangible) inside and/or outside the project area.
13. Negatively impact areas with cultural, historical or transcendent values for individuals and communities.

In advance of the initiation of any project activity, the Gender and Safeguards Specialist of the PMU should fill in detailed information regarding the nature of the activity and its specific location in the *Safeguards Eligibility and Impacts Screening Tool* (Annex 1). Part 1 of this form comprises of basic information regarding the activity; Part 2 contains basic “pre-screening” questions. If the response to any of the questions in these two parts is “Yes”, the activity will be deemed ineligible for funding under the Project. The executing partners will thus be required to change the nature or location of the proposed activity so that it complies with all safeguards requirements and all responses at the *Safeguards Eligibility and Impacts Screening* form are negative.

If the activity is deemed eligible according to Part 2, an environmental and social screening procedure will be carried out in accordance with Part 3 of *Safeguard Eligibility and Impacts Screening* format, which is based on the WWF’s SIPP and applicable Madagascar laws and regulations. The executing partners shall respond to the specific questions in Part 3 of the form, provide general conclusions regarding the main environmental and social impacts of each proposed activity, outline the required permits or clearances, and specify whether any additional assessments or safeguard documents (e.g., ESMP) should be prepared.

Issues that are considered as part of this environmental and social screening include the following:

- a. Environmental impacts such as localized habitat disturbance, waste generation, emissions, and potential pollution linked to livelihood-based activities, and small-scale infrastructure;
- b. Social impacts including exclusion of vulnerable groups, restrictions on access to natural resources, risks of elite capture, potential for child labor, GBV/SEAH, and impacts on tangible or intangible cultural heritage;
- c. Health and safety risks both for community members and for workers involved in physical project activities such as community patrols, mangrove restoration, infrastructure installation, or live.

The screening of each activity should be undertaken by the Gender and Safeguards Specialist. If the screening process indicates that additional assessments or safeguards documents shall be prepared, these should be carried out by the executing partners prior to the start of activities.

If the screening reveals adverse environmental or social impacts that may arise from the planned activity, an ESMP should be prepared. The ESMP should be prepared by the Gender and Safeguards Specialist, in collaboration with the Project Manager(s).

5.2. Guidelines for ESMP Development

In case that the Environmental and Social screening process identifies any adverse environmental or social impacts as a result of specific project activities, the Gender and Safeguards Specialist in collaboration with the Project Manager(s) should develop a site- and activity-specific ESMP. The ESMP should be prepared before the initiation of the project activity and closely follow the guidance provided in this ESMF.

The ESMP should describe adverse environmental and social impacts that are expected to occur as a result of the specific project activity, outline concrete measures that should be undertaken to avoid or mitigate these impacts, and specify the implementation arrangements for administering these measures (including institutional structures, roles, communication, consultations, and reporting procedures).

The structure of the ESMP should be as follows:

- (i) **A concise introduction:** explaining the context and objectives of the ESMP, the connection of the proposed activity to the project, and the findings of the screening process.
- (ii) **Project description:** Objective and description of activities, nature and scope of the project (location with map, construction and/or operation processes, equipment to be used, site facilities and workers and their camps; bill of quantities if civil works are involved, activity schedule).
- (iii) **Baseline environmental and social data:** Key environmental information or measurements such as topography, land use and water uses, soil types, and water quality/pollution; and data on socioeconomic conditions of the local population. Photos showing the existing conditions of the project sites should also be included.
- (iv) **Expected impacts and mitigation measures:** Description of specific environmental and social impacts of the activity and corresponding mitigation measures.
- (v) **ESMP implementation arrangements:** Responsibilities for design, bidding and contracts where relevant, monitoring, reporting, recording and auditing.
- (vi) **Capacity Need and Budget:** Capacity needed for the implementation of the ESMP and cost estimates for implementation of the ESMP.
- (vii) **Consultation and Disclosure Mechanisms:** Timeline and format of disclosure.
- (viii) **Monitoring:** Environmental and social compliance monitoring with responsibilities.
- (ix) **Grievance Mechanism:** Provide information about the grievance mechanism, how PAPs can access it, and the grievance redress process.
- (x) **A site-specific community and stakeholder engagement plan:** In order to ensure that local communities and other relevant stakeholders are fully involved in the implementation of the ESMP, a stakeholder engagement plan should be included in the ESMP. Specific guidelines on community engagement are provided in Section 5.5 below.

5.3. Stakeholders' Role & Responsibilities in the ESMF Implementation

(f) General

The institutional arrangement for project implementation includes WWF-US as the GEF Agency, the Ministère de l'Environnement et du Développement Durable (MEDD) as the Lead Executing

Agency, and a National Steering Committee (NSC) providing strategic guidance. These actors are supported by a network of co-executing agencies and technical partners to ensure the effective delivery of all project components and compliance with environmental and social safeguard standards.

Implementing Agency (IA)

WWF-US is the GEF Implementing Agency for this project. Its overall role includes technical and financial oversight, supervision, and ensuring full compliance with GEF policies and procedures. WWF-US is also responsible for monitoring and evaluation of project activities. In addition, the WWF-GEF Agency will provide recommendations to optimize project performance and will arbitrate and resolve any execution-related conflicts.

Executing Agency (EA)

The Ministry of Environment and Sustainable Development (MEDD) is the lead Executing Agency for the project, providing strategic leadership and overall policy direction. MEDD oversees alignment with national priorities, ensures high-level stakeholder coordination, and facilitates inter-institutional collaboration. MEDD remains accountable to the WWF-GEF Agency for the achievement of project outcomes, the quality of implementation, and compliance with GEF policies and safeguards.

Fiduciary Agent (FA)

The FAPBM is an organization with recognized expertise in financial and procurement management for environmental projects, as well as in providing sustainable finance for protected areas in Madagascar. Under a tripartite agreement between the WWF-GEF Agency, MEDD, and FAPBM, the FAPBM acts as the fiduciary entity of the GBFF project. It is responsible for contracting project partners and ensuring that all financial flows comply with WWF-GEF due diligence procedures. The division of responsibilities between FAPBM and the PMU for financial management will be clearly defined. FAPBM also plays an executing role by supporting the development of sustainable financing mechanisms under Component 2 and responding to community needs under Component 3.

Project Management Unit (PMU)

The Project Management Unit (PMU) is hosted by MEDD and operates under the authority of a Project Director appointed by the Ministry. The Project Director ensures that MEDD maintains strategic leadership over the project, while the PMU handles daily project management. The PMU is responsible for implementing best practices in line with WWF-US GEF standards (processes, policies, tools, and templates). In close coordination with FAPBM, the PMU manages contractual arrangements with partners and mobilizes technical assistance as needed to support components not directly implemented by project partners.

The PMU team is composed of:

- One National Coordinator
- One Monitoring and Evaluation Officer
- One Gender and Safeguards Specialist
- One Communications Coordinator
- One Administrative and Financial Manager (based at FAPBM)

National Steering Committee (NSC)

A National Steering Committee (NSC) will be established to provide overall project oversight and strategic guidance. The NSC will ensure continued alignment between the project and the mandate of MEDD. It will also strengthen linkages with high-level policy processes within the Government of Madagascar, ensuring national accountability and coherence. The NSC will review

and approve annual work plans and budgets, validate key project outputs, facilitate effective project implementation, and intervene in the event of conflicts within the project or between project partners. The NSC will be chaired by the Secretary General (SG) of MEDD, who will convene the meetings. Chairing may be delegated to another senior MEDD official, with appropriate authority and no lower than Director level. The PMU will support MEDD in convening, organizing, and documenting the NSC meetings. Efforts will be made to coordinate with other committees and structures involved in complementary initiatives related to the GBFF project, such as the Sydney Steering Committee, the PFP partner coordination group, and the National 30x30 Committee.

Executing partners at the field activity level (LMMA sites)

Executing partners, including NGOs, technical service providers, and community support organizations, play a central role in the implementation of Component 3 of the project. Acting as intermediary structures, they support LMMA governance bodies (such as VOIs, CLBs, and TGRH committees) in the planning, implementation, and monitoring of project activities aimed at strengthening effective management and governance, and promoting sustainable practices and livelihoods. They provide tailored technical assistance, capacity building, mentoring, and logistical support adapted to the needs of each LMMA context.

1

(g) Safeguards Implementation

Specific arrangements and responsibilities related to the implementation of environmental and social safeguards requirements, as stated in this ESMF and Process Framework, are as follows:

Project Management Unit (PMU):

- Oversee the application of safeguard instruments across all components and ensure alignment with national regulatory frameworks.
- Ensure the operational implementation of all safeguard instruments at field and institutional levels.
- Integrate environmental and social safeguards into annual work plans, procurement processes, M&E systems, and budget allocations.
- Monitor safeguard indicators, coordinate with technical partners, and report on safeguard performance in all progress reports submitted to the WWF GEF Agency.
- Lead stakeholder engagement and ensure that grievance mechanisms are functional and accessible.

Gender and Safeguards Specialist (within PMU):

- Serve as the technical focal point for all environmental and social safeguard matters throughout the project lifecycle (including gender aspects).
- Ensure the effective implementation of the ESMF, Process Framework, GAP, SEP, and other safeguard instruments.
- Coordinate the preparation of site-specific instruments (e.g., ESMPs, Livelihood Restoration Plans), support partners in their implementation, and ensure quality control.
- Train and support executing partners, community structures, and contractors on safeguard obligations, gender concepts and GAP implementation.

- Maintain safeguard records and feed information into the M&E system and grievance redress database.
- Liaise directly with the WWF GEF Agency on all matters related to safeguard compliance and incident reporting.

Executing partners at the field activity level (LMMA sites)

- Prepare site-specific safeguard instruments (e.g., ESMPs, Livelihood Restoration Plans) as required by the E&S screening, with technical support from the PMU.
- Implement the mitigation and management measures outlined in these instruments.
- Collect field data and provide regular updates to support safeguard monitoring, including incident alerts and relevant documentation to the PMU.
- Ensure that project-affected people are informed about the grievance mechanism and can access it easily.

Participate in safeguard-related training and capacity building activities coordinated by the Gender and Safeguards Specialist.

5.4. Monitoring

The effective implementation of the ESMF/PF will be closely monitored at three interrelated levels: project, field activity, and agency oversight.

(a) Monitoring at the project level

At the project level, the Gender and Safeguards Specialist will lead the monitoring activities and report on compliance indicators related to the ESMF/PF, as outlined in the table below, as part of regular project reporting.

Table 3. Overview of ESMF/PF Monitoring Activities

Scope	Monitoring activity	Indicators
Implementation of the ESMF	Monitor the rollout of the ESMF across relevant interventions, including screening, assessments, and application of safeguard procedures.	- % of projects screened using ESSF - % of ESMPs validated within 4 months of activity design - Level of satisfaction of interested stakeholders with the ESMF
Implementation of the ESMPs and LRPs	Track the application of safeguard measures defined in the ESMPs and LRPs	- % of ESMP and LRP measures fully implemented within planned timeframe - % of mitigation measures monitored with participation of affected stakeholders - Level of satisfaction of affected stakeholders with the ESMPs and LRPs

Scope	Monitoring activity	Indicators
Grievance redress monitoring	Record and monitor grievances from all stakeholders, including workers, using the GRM system. Track resolution time and effectiveness.	- Number of grievances received (disaggregated by type, sex, stakeholder group) - % of grievances resolved within 30 days - % of complainants satisfied with response - % of worker grievances resolved without escalation

(b) Monitoring at the field activity level

At the field activity level, monitoring will be required for interventions at LMMA sites that necessitate the development of an ESMP and/or an LRP. These plans will include a dedicated monitoring section outlining relevant indicators, responsibilities, and reporting arrangements.

Throughout implementation, executing entities will carry out the agreed monitoring activities and submit their findings to the PMU as part of the semi-annual reporting process. These reports will include, at a minimum, the information necessary to track the safeguard indicators defined at the project level.

At project closure, executing entities will be required to submit a final summary of all safeguard compliance activities as part of their completion and impact reports.

Disbursement of project funds will be contingent upon their full compliance with the safeguards requirements.

(c) Monitoring at the agency level

WWF as the project's implementing agency and the MEDD as the executing agency are responsible to oversee compliance with the ESMF/PF.

In order to facilitate compliance monitoring, the MEDD will include information on the status of ESMF implementation in the six-monthly Project Progress Reports (PPRs) and the annual Project Implementation Review (PIR) reports.

5.5. Community Engagement

Community consultation has been an integral part of these assessments as well as the proposed project design and will be carried out as a continuous process through the project cycle. This section provides an overview of the engagement process to date and outlines how participation will be sustained. Further details are available in the Stakeholder Engagement Plan (SEP), which sets out methods, tools, and responsibilities for stakeholder engagement across the project cycle.

(a) Community Engagement during Project and Safeguard Preparation

During the Project Preparation Grant (PPG) phase, extensive consultations were conducted at national, regional, and local levels to inform the project's design and safeguard instruments. In the three target seascapes—Diana, Manambolo-Tsiribihina, and Mahafaly—field missions enabled direct engagement with LMMA stakeholders, community management bodies (VOI/CLB, TGRH committees), and resource users, including women, youth, and migrant fishers.

These participatory assessments served a dual purpose: to validate project priorities and to inform the ESMF/ PF, the SEP and the GAP. Community members were consulted in small groups

divided by gender. They were invited to identify environmental and social risks, concerns about access restrictions, power asymmetries in governance, and the vulnerability of marginalized groups. Their feedback directly shaped the design of the project's safeguards approach.

(b) Community Engagement during Project Implementation

The communities residing in and around the project area are the ultimate recipient of project impacts and benefits, and therefore a key stakeholder- their participation and support is key to project success. During implementation, the project will continue to promote meaningful and inclusive participation through structured and ongoing engagement mechanisms:

- Consultations will be systematically held prior to all major decisions affecting community access, governance, or livelihoods, including the adoption or revision of TGRN/TGRH contracts, zoning decisions, or the design of LRPs.
- Inclusion of vulnerable groups—notably women, youth, migrants—will be prioritized using gender-responsive methods and culturally appropriate tools, in line with the SEP and the Gender Action Plan.
- Participatory monitoring will be operationalized via LMMA committees and local platforms, allowing communities to contribute to environmental and social monitoring and feedback loops.
- Grievance mechanisms will be made accessible to all users through community outreach, trusted focal points, grievance boxes, and oral reporting channels, ensuring timely and transparent resolution of complaints.
- Local partners and LMMA promoters, such as NGOs and the Mihari Network, will play a key role in facilitating ongoing engagement and trust-building throughout the project lifecycle.

All engagement activities will be documented and tracked as part of the safeguard monitoring system to ensure transparency, accountability, and continuous learning.

5.6. Guidance for SEAH Risk Mitigation

A detailed plan to address SEAH risks will be developed within the first six months of project start-up, using both information already included in the GAP and updated procedures for SEAH-specific grievances outlined in Section 5.9 below. This will include:

- Inclusion of any identified SEAH-related risk mitigation measures into the project's annual workplan and budget and annual reporting requirements.
 - This will require the participation of the entire PMU in reviewing any identified risks and mitigation measures to ensure that all staff understand their responsibilities and the responsibilities of Executing Entities, project partners, contractors, and any other entities who will receive GCF funding for this project.
- Development of a communication mechanism between the local project partners and the PMU's Gender and Safeguards Specialist in order to address in a timely manner any SEAH situation that may arise at the territorial level. This early warning system will be included in the project's security protocol, and will require:
 - Reporting any such grievances or challenges within a defined time period of no less than 5 business days. This shall hold true even if grievances are informally submitted (i.e. not through an official GRM)

- The confidentiality of anyone who has received a complaint or become aware of a SEAH-related situation, including protecting the personal identifiable information of all parties- both the potential victim(s) and potential perpetrators(s).
- Strengthen the capacities of the project's executing partners on prevention of GBV and SEAH as well as WWF policies and codes of conduct to address SEAH risk. These trainings will be done in partnership by the project's Gender & SEAH and ESS Specialists and should include:
 - Training within the first 3 months of project implementation that have been prepared with oversight and final approval from the WWF GCF AE Safeguards and Gender Leads.
 - Be mandatory for all executing partner staff who will be involved in the GCF-financed activities.
- Strengthen the LMMA Committees and landscape technical committees so that they can establish rapid response mechanisms to address issues associated with threats to environmental leaders and gender-based violence. This includes, but is not limited to:
 - In cases of such threats, provide them with additional resources to ensure a timely response that is focused on the well-being of anyone who is threatened.
 - Provide the same GBV and SEAH training to these committees that the executing partners will receive.
- Strengthen the capacities of the entities that participate in the multi-stakeholder bodies that will be strengthened by the project, so that specific prevention and rapid response measures are included to address GBV and SEAH-specific threats, including to social and environmental leaders they may work with.
 - Provide the same GBV and SEAH training to these multi-stakeholder bodies that the executing partners will receive.

5.7. Communications and Disclosure

All affected communities and relevant stakeholders shall be informed about the ESMF requirements and commitments. The executive summary of the ESMF will be translated into French and Malagasy and made available along with the ESMF and SEP on the websites of the MEDD, as well as the websites of the WWF GEF Agency. Hard copies of the ESMF will be placed in appropriate public locations and at PMU offices. Project Managers and the Safeguards and Gender Specialists at MEDD will be responsible to raise community awareness regarding the requirements of the ESMF, and will also ensure that all external contractors and service providers are fully familiar and comply with the ESMF and other safeguards documents.

During the implementation of the project, activity-specific ESMPs shall be prepared in consultation with affected communities and disclosed to all stakeholders prior to project concept finalization. All draft ESMPs shall be reviewed and approved by the MEDD in consultation with the NSC and WWF GEF Agency in advance of their public disclosure. The PMU must also disclose to all affected parties any action plans prepared during project implementation, including gender mainstreaming.

Disclosure should be carried out in a manner that is meaningful and understandable to the affected people. For this purpose, the executive summary of ESMPs or the terms and conditions in environment clearances should be disclosed on MEDD and WWF websites.

The disclosure requirements are summarized in the Table below.

Table 4. Disclosure framework for ESMF related documents

Documents to be disclosed	Frequency	Where
Environment and Social Management Framework	Once in the entire project cycle. Must remain on the website and other public locations throughout the project period.	On the website of MEDD and WWF. Copies should be available at the PMU office, and in local municipal offices in project areas
Environmental and Social Management Plan/s	Once in the entire project cycle for every activity that requires ESMP. Must remain on the website and other disclosure locations throughout the project period.	On the website of MEDD and WWF. Copies should be available at the PMU office, and in local municipal offices in project areas
Safeguards Monthly Progress Report	Monthly	Copies should be available at the PMU office, and in local municipal offices in project areas
Minutes of Formal Public Consultation Meetings	Within two weeks of meeting	On the website of MEDD and WWF. Copies should be available at the PMU office, and in local municipal offices in project areas
Grievance redress process	Quarterly, throughout the project cycle	On the website of MEDD. Copies should be available at the PMU office

5.8. Capacity Building and technical assistance

Capacity building activities will be provided as needed by WWF US to the MEDD to provide the latter with ESMF/PF implementation requirements and good practices. These will focus in particular on issues related to the preparation of LRPs, organization of consultations, operationalization of the GRM, integration of GBV/SEAH risk mitigation and monitoring of ESMF implementation. The budget for capacity building shall be included in Component 5 of the project.

5.9. Grievance Mechanisms

The project will have direct and tangible effects on local communities and individuals residing in or near implementation areas. An efficient and effective Grievance Redress Mechanism (GRM) is therefore essential to capture and respond to stakeholders' inquiries, concerns, suggestions, and complaints in a timely and transparent manner.

The GRM will operate based on the following principles:

1. **Fairness:** Grievances are assessed impartially, and handled transparently.
2. **Objectiveness and independence:** The GRM operates independently of all interested parties in order to guarantee fair, objective, and impartial treatment to each case.
3. **Simplicity and accessibility:** Procedures to file grievances and seek action are simple enough that project beneficiaries can easily understand them and in a language that is accessible to everyone within a given community, especially those who are most vulnerable.

4. **Responsiveness and efficiency:** The GRM is designed to be responsive to the needs of all complainants. Accordingly, officials handling grievances must be trained to take effective action upon, and respond quickly to, grievances and suggestions.
5. **Speed and proportionality:** All grievances, simple or complex, are addressed and resolved as quickly as possible. The action taken on the grievance or suggestion is swift, decisive, and constructive.
6. **Participation and inclusiveness:** A wide range of affected people—communities and vulnerable groups—are encouraged to bring grievances and comments to the attention of the project implementers. Special attention is given to ensure that poor people and marginalized groups, including those with special needs, are able to access the GRM.
7. **Accountability and closing the feedback loop:** All grievances are recorded and monitored, and no grievance remains unresolved. Complainants are always notified and get explanations regarding the results of their complaint. An appeal option shall always be available.

Complaints may include, but are not limited to, the following issues:

- (i) Allegations of fraud, malpractice, or corruption involving staff or other stakeholders engaged in any project-financed or -implemented activity, including cases of gender-based violence (GBV), sexual exploitation, abuse, or harassment (SEAH);
- (ii) Environmental and/or social harms resulting from project activities—whether ongoing or completed—including pollution, adverse impacts on public health, destruction of natural habitats, disproportionate impacts on marginalized or vulnerable groups, and damage to physical or cultural heritage;
- (iii) Complaints from permanent or temporary workers involved in project activities, particularly those related to labor and working conditions, including occupational health and safety (OHS) concerns.

The operational framework for the GRM is detailed in the Stakeholder Engagement Plan (SEP), which outlines procedures for receiving, documenting, assessing, and resolving grievances related to environmental and social risks, including those linked to exclusion, access restrictions, labor conditions, GBV/SEAH, and child labor.

The GRM seeks complement, rather than substitute, the judicial system and other dispute resolution mechanisms. All complainants may therefore file their grievance in local courts or approach mediators or arbitrators, in accordance with the legislation of Madagascar.

In addition to the project-specific GRM, a complainant can submit a grievance to the WWF GEF Agency. A grievance can also be filed with the Project Complaints Officer (PCO), a WWF staff member fully independent from the Project Team, who is responsible for the WWF Accountability and Grievance Mechanism and who can be reached at:

Email: SafeguardsComplaint@wwfus.org

Mailing address:

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

Stakeholders may also submit a complaint online through an independent third-party platform at <https://secure.ethicspoint.eu/domain/media/mg/gui/113222/index.html>

To ensure its accessibility and effectiveness, the Grievance Redress Mechanism (GRM) must be widely disseminated among all project stakeholders, with a particular focus on communities directly engaged in project activities. Dissemination will be conducted through community meetings organized in local languages, providing clear and culturally appropriate explanations of the GRM's purpose, process, and points of contact. Additionally, illustrated posters detailing how to submit a grievance—including visual guidance for populations with low literacy—will be displayed in strategic and accessible locations (e.g., community centers, LMMA posts, health centers, schools). These efforts aim to ensure that all stakeholders, especially the most vulnerable, are aware of their rights and know how to safely and confidentially raise concern.

In addition, special training will be provided to the ESS Specialists within the first 6 months of project implementation, or before the GRM is finalized, whichever is sooner. This will help to ensure they have the capacity to address SEAH-related grievances in a culturally sensitive and victim-centered way.

5.10. Budget

The ESMF implementation costs, including all costs related to compensation to project affected people, will be fully covered from the project budget. It will be the responsibility of the Gender and Safeguards Specialist to ensure that sufficient budget is available for all activity-specific mitigation measures that may be required in compliance with the ESMF.

A full time Gender and Safeguards Specialist will be employed and 100% of their time will be dedicated to ensuring the ESMF implementation. The Project Manager will oversee the ESMF implementation.

Budget for capacity building on ESMF/PF implementation, travel costs and workshops and meetings for safeguards monitoring (including travel, workshops and meetings) will be included in the overall monitoring and evaluation budget under Component 5 of the project.

ANNEX 1. SAFEGUARD ELIGIBILITY AND IMPACTS SCREENING TOOL

This screening tool needs to be filled out for each activity or category of activities included in the annual work plan and budget. In addition, the screening tool needs to be completed whenever management measures or management plans are developed and/or when project intervention areas are determined.

The tool will be filled out by the Gender and Safeguards Specialist and reviewed by the M&E Officer. The decision on whether a Site-Specific Environmental and Social Management Plan (ESMP) or Livelihood Restoration Plan (LRP) are required shall be made by the Gender and Safeguards Specialist in consultation with the WWF GEF Agency Safeguards Specialists, based on the information provided in this screening form, as well as interviews with the PMU staff, local communities, and any other relevant stakeholders.

Part 1: Basic Information

1	Activity Name	
2	Description of Activity ("sub-activities")	
3	Type of Activity:	New activity ☐ Continuation of activity ☐
4	Activity location:	
5	Total size of site area	
6	Activity implementation dates	
7	Total cost	

(Move to Part 2 after filling in all information in the table above)

Part 2: Eligibility Screening

No.	Screening Questions: <i>Would the project activity</i>	Yes	No	Comments/ Explanation
1	Lead to land management practices that cause degradation (biological or physical) of the soil and water. Examples include, but are not limited to: the felling of trees in core zones and critical watersheds; activities involving quarrying and mining; or commercial logging?			
2	Negatively affect areas of critical natural habitats or breeding ground of known rare/endangered species?			
3	Significantly increase GHG emissions?			
4	Use genetically modified organisms or modern biotechnologies or their products?			
5	Involve the procurement and/or use of pesticides and other chemicals specified as persistent organic pollutants under the Stockholm Convention or within categories IA, IB, or II by the World Health Organization?			
6	Develop forest plantations?			
7	Result in the loss of biodiversity, alteration of the functioning of ecosystems, and introduction of new invasive alien species?			
8	Involve the procurement or use of weapons and munitions or fund military activities?			
9	Lead to private land acquisition and/or the to physical displacement and voluntary or involuntary relocation of people, including non-titled and migrant people?			
10	Contribute to exacerbating any inequality or gender gap that may exist?			
11	Involve illegal child labor, forced labor, sexual exploitation or other forms of exploitation?			
12	Adversely affect indigenous peoples' rights, lands, natural resources, territories, livelihoods, knowledge, social fabric, traditions, governance systems, and culture or heritage (physical and non-physical or intangible) inside and/or outside the project area?			
13	Negatively impact areas with cultural, historical or transcendent values for individuals and communities?			
Please provide any further information that can be relevant:				

If all answers are “No”, project activity is eligible and move to Part 3. If at least one question answered as “yes”, the project activity is ineligible, and the proponent can reselect the site of project activity and do screening again.

Part 3: Impacts screening

Answer the questions below and follow the guidance to provide basic information regarding the suggested activity and describe its potential impacts.

No.	Would the project activity:	Yes/No	Provide explanation and supporting documents if needed
Environmental Impacts			
1	Result in permanent or temporary change in land use, land cover or topography.		
2	Involve clearance of existing land vegetation		If yes, number of trees to be cut down: Species of trees: Are the trees protected: Total land area of vegetation cover removed: Estimated economic value of the trees, crops and vegetation to be cut down / removed and any replacement costs (e.g., fees, registration, taxes): <i>Provide additional details:</i>
3	Does the activity involve reforestation or modification of natural habitat? If yes, will it involve use or introduction of non-native species into the project area?		
4	Will pesticides be used? If so, are they on the list of those excluded by the Stockholm Convention?		
5	Result in environmental pollution? This may include air pollution, liquid waste, solid waste, or waste as the result of earth moving or excavation for example		
6	Trigger land disturbance, erosion, subsidence, or instability?		
7	Result in significant use of water, such as for construction?		
8	Produce dust during construction and operation?		
9	Generate significant ambient noise?		
10	Increase the sediment load in the local water bodies?		

No.	Would the project activity:	Yes/No	Provide explanation and supporting documents if needed
11	Change on-site or downstream water flows?		
12	Negatively affect water dynamics, river connectivity or the hydrological cycle in ways other than direct changes of water flows (e.g. water filtration and aquifer recharge, sedimentation)?		
13	Result in negative impacts to any endemic, rare or threatened species; species that have been identified as significant through global, regional, national, or local laws?		
14	Could the activity potentially increase the vulnerability of local communities to climate variability and changes (e.g., through risks and events such as landslides, erosion, flooding, or droughts)?		
<i>Socio-Economic Impacts</i>			
15	Negatively impact existing tenure rights (formal and informal) of individuals, communities or others to land, fishery and forest resources?		
16	Restrict access to natural resources (e.g., watersheds or rivers, grazing areas, forestry, non-timber forest products) or restrict the way natural resources are used, in ways that will impact livelihoods?		
17	Restrict access to sacred sites of local communities (including ethnic minorities) and/or places relevant for women's or men's religious or cultural practices?		
18	Operate where there are any cultural heritage or religious or sacred sites that may be impacted by the project?		
19	Undermine the customary rights of local communities to participate in consultations in a free, prior, and informed manner to address interventions directly affecting their lands, territories or resources?		
<i>Labor and Working Conditions</i>			
20	Involve hiring of workers or contracting with labor agencies to provide labor? If yes, answer questions a-b below.		
	a. Are labor management issues prevalent in the landscape? b. Are illegal child labor issues prevalent in the landscape?		

No.	Would the project activity:	Yes/No	Provide explanation and supporting documents if needed
21	Involve working in hazardous environments such as steep, rocky slopes, areas infested with poisonous animals and/or disease vectors?		
Minorities and Vulnerable Groups			
22	Negatively affect vulnerable groups (such as ethnic minorities, women, poorer households, migrants, and assistant herders) in terms of impact on their economic or social life conditions or contribute to their discrimination or marginalization?		
23	Stir or exacerbate conflicts among communities, groups or individuals? Also considering dynamics of recent or expected migration including displaced people, as well as those who are most vulnerable to threats of sexual exploitation, abuse or harassment?		
Occupational and Community Health and Safety			
24	Involve any risks related to the usage of construction materials, working high above the ground or in canals where slopes are unstable?		
25	Expose local community to risks related to construction works or use of machinery (e.g., loading and unloading of construction materials, excavated areas, fuel storage and usage, electrical use, machinery operations)?		
26	Generate societal conflicts, increased risk of sexual exploitation, abuse or harassment or pressure on local resources between temporary workers and local communities?		
27	Work in areas where forest fires are a threat? If yes, how recently was the last one?		
28	Work in areas where there the presence or history of vector-borne diseases (some examples include malaria, yellow fever, encephalitis)		
GBV/SEAH Risks			
29	Is there a risk that the project could pose a greater burden on women by restricting the use, development, and protection of natural resources by women compared with that of men?		
30	Is there a risk that persons employed by or engaged directly in the project might engage in gender-based violence (including sexual exploitation, sexual abuse, or		

No.	Would the project activity:	Yes/No	Provide explanation and supporting documents if needed
	sexual harassment)? The response must consider risks not only at the beneficiary level, but also to workers within all the organizations receiving GEF funding.		
31	Does the project increase the risk of GBV and/or SEAH for women and girls, for example by changing resource use practices or singling out women and girls for training without complimentary training/education for men? The response must consider all workers within the organizations receiving GEF funding.		
32	Does any mandated training for any individuals associated with the project (including project staff, government officials, park rangers and guards, other park staff, consultants, partner organizations and contractors) cover GBV/SEAH (along with human rights, etc.)?		
Conflict Sensitivity and Risks			
33	Are there any major underlying tensions or open conflicts in the landscape/seascape or in the country where the landscape/seascape is situated? If yes, answer a-d below		
	a. Is there a risk that the activities interact with or exacerbate existing tensions and conflicts in the landscape/seascape? b. Do stakeholders (e.g. executing partners, rights holders, other stakeholder groups) take a specific position in relation to the conflicts or tensions in the landscape/seascape or are they perceived as taking a position? c. How do stakeholders perceive WWF Country Office and its partners in relation to existing conflicts or tensions? d. Could the conflicts or tensions in the landscape/seascape have a negative impact on the activities?		
34	Could the activities create conflicts among communities, groups or individuals?		
35	Are some groups (stakeholders, rights holders) benefiting more than others from the activities? And if so, how is that affecting power dynamics and mutual dependencies?		

No.	Would the project activity:	Yes/No	Provide explanation and supporting documents if needed
36	Do the activities provide opportunities to bring different groups with diverging interests positively together?		

List of documents to be attached with Screening form

1	Layout plan of the activity and photos
2	Summary of the activity proposal
3	No objection certificate from various departments and others relevant stakeholders

Screening Tool Completed by

Signed:

Name: _____

Title: _____

Date: _____

Part 4: Screening Conclusions

[TO BE COMPLETED BY the Gender and Safeguards Specialist]

(a) Main environmental issues are:

(b) Permits/ clearance needed are:

(c) Main social issues are:

(d) Further assessment/ investigation needed and next step.

- Need for any special study:
- Preparation of ESMP (main issue to be addressed by the ESMP):
- Preparation of LRP (main issue to be addressed by the LRP):
- Any other requirements/ need/ issue etc:

Screening Tool reviewed by

Signed:

Name: _____

Title: _____

Date: _____

ANNEX 2. EXCLUSION LIST

The following practices and activities will not be supported by the project:

1. Land or water management practices that cause degradation (biological or physical) of the soil and water.
2. Activities that negatively affect areas of critical natural habitats or breeding ground of known rare/ endangered species.
3. Actions that represent significant increase in GHG emissions.
4. Use of genetically modified organisms, or the supply or use of modern biotechnologies or their products in crops.
5. Introduction of crops and varieties that previously did not grow in the implementation areas, including seed import/transfer.
6. Actions resulting in loss of biodiversity, alteration of the functioning of ecosystems, and introduction of new invasive alien species.
7. Procurement of pesticides or activities that result in an increase in the use of pesticides.
8. Activities that would lead to physical displacement and voluntary or involuntary relocation.
9. Activities that do not consider gender aspects or contribute to exacerbating any inequality or gender gap that may exist.
10. Child Labor.
11. Activities that would adversely affect IPs' rights, lands, natural resources, territories, livelihoods, knowledge, social fabric, traditions, governance systems, and culture or heritage (physical and non-physical or intangible) inside and/or outside the project area.
12. Activities that would negatively impact areas with cultural, historical or transcendent values for individuals and communities.