

Office of the Vice-President

Department of the Blue Economy

Oliaji Trade Centre, P.O. Box 55, Victoria, Republic of Seychelles
Telephone: 4326200



Please address all correspondence to Principal Secretary

Date: 16th December 2019

In the aide memoire of the World Bank's mission in September 2018, the World Bank requested for the SeyCCAT and DBS manuals to be updated in line with the revised Environmental and Social procedures. Before revising these documents, the Government of Seychelles felt that it was necessary to first update the SWIOFish3 ESMF. After discussion with World Bank in January 2019, it was decided that an addendum to ESMF will be prepared in order to avoid the lengthy process of disclosing a revised ESMF. Thus, this addendum to the ESMF publishes on the 16th day of December 2019 replaces the following sections of the ESMF.

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke.

Mr. Kenneth Racombo
Principal Secretary, DBE

5.0 ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

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

5.1 Environmental and Social Risk Assessment Process

✓ Environmental and Social Screening

Environmental and social screening is a useful tool for identifying safeguard issues in large investment programs consisting of many sub-projects. It helps determine (i) anticipated environmental/social impacts, risks and opportunities of the sub-project (ii) if the anticipated impacts and public concern warrant further environmental/social analysis, and (iii) if so to recommend the appropriate type and extent of assessments needed. Screening is the process by which proposed sub-projects are reviewed to determine the level of environmental and social assessment to which they should be subjected, which could range from none at all up to a full Environmental and Social Impact Assessment (ESIA). It is the process of reviewing a proposed activity against a checklist of factors to determine whether it is likely to have adverse environmental and social effects, and if so, what mitigation measures should be applied.

At the project level, proposed sub-component activities need to be subjected to screening to determine whether or not they should be subject to an Environmental and/or Social Review. This is a simple review of the likely implications of the activity, to determine whether it is acceptable, and if so, whether any particular mitigation measures should be applied.

For all project proposals, the Environmental and Social (E&S) Specialist at the PIU should fill out a subproject screening form (see Annex V for Environmental and Social Screening Form). In completing this form, the PIU E&S may need to consult secondary information sources, other specialists at the MFTIEP or at the other co-implementing ministries (i.e., MFAG, and MEECC), and/or the sub-project proponent and undertake field appraisal if the environmental and social information available is insufficient or if the sub-project is likely to cause significant negative impacts.

The field appraisal should include a visit to the subproject location and interviews with local stakeholders who can provide useful input on social and environmental impacts. All key stakeholders, including potentially project affected people (PAP) should be identified and a list of PAPs should be included in the screening report. These outcomes of the screening will undergo consultation with the Environmental Assessment and Permit Section (EAPS) of the MEECC in order to verify and confirm the potential impacts and that the proposed mitigation measures are in line with national requirements. In the particular case of TORs for ESIA's, the MEECC through the EAPS must give its formal approval as national environmental authority. Screening will take place during the selection phase of both the SeyCCAT's BGF and DBS's BIF project cycles.

✓ Minor economical displacement impacts

As stated in the Exclusion list, "Subprojects which cause significant socioeconomic impacts involving permanent involuntary resettlement will not be eligible".

If a subproject is found to have minor economic displacement impacts, i.e. minor losses, equivalent to less 10% of their productive assets (loss of assets, or temporary loss of activity), to ensure the elaboration and

implementation of early compensation measures for these non-substantial economic losses, (ex: loss of a wall or of crops), the E&S Specialist at the PIU, will indicate the estimated number of potential persons affected and the type of assets/activity affected, with a justification and evidence that such impacts are minor. Any compensation will be at replacement cost. The calculation of the compensation and the agreements made with the PAPs (as well as the proof that consultations occurred) will be submitted as part of the ESMP or other relevant instrument.

These principles will be updated in the Process Framework (PF) and should be in accordance with national regulations and OP 4.12.

✓ **Assessment and Classification of Impacts:**

Based on the screening template and field appraisal (if necessary) the impacts are classified based on the level of risk/risk category.

All sub-component activities should be categorised according to the following criteria:

Category A: having significant or irreversible adverse environmental or social risks and/or impacts;

Category B: having adverse environmental impacts that are few, site specific and in most cases, that will have mitigation measures that are easily designed and implemented;

Category C: having minimal or no adverse social and environmental impact and will only be subject to an initial environmental & social screening and any appropriate national impact provisions.

If subprojects trigger national EIA requirements, they will be referred to the appropriate government agency. Regarding World Bank Safeguard Policies and Bank classifications, it is anticipated that with the exception of Project-imposed fishing access controls (which are dealt with through the Process Framework), virtually all subprojects funded under the project will, at most, be classified as Category B projects and some sub-projects are expected to be considered Category C. It is unlikely that any subproject will be categorized as a Category A subproject mainly due to the exclusion list criteria.

✓ **Environmental and Social Safeguards Instruments for Subprojects**

Depending on the category of the sub-project, appropriate environmental and social safeguards instruments will be required. Minimum Environmental and Social Assessment instrument requirements per Category are demonstrated below:

Subproject category	Minimum Requirements
Category A	<ul style="list-style-type: none"> • Environmental and Social Impact Assessment (see Annex X) and Site-Specific Environmental and Social Impact assessment and Management Plan (see Annex VI). • Specific socio-economic studies may be required under the process framework included as a separate report.
Category B	<ul style="list-style-type: none"> • Site-Specific Environmental and Social Management Plan (see Annex VI). • Specific socio-economic studies may be required under the process framework included as a separate report.
Category C	<ul style="list-style-type: none"> • No additional E&S Assessments are required, however, in circumstances where minimal impacts have been identified a simplified ESMP can be developed (see Annex XII). The project must also comply with National Laws and Regulations.

Other specialized Management Plans such as, Resettlement Action Plans, Livelihood Restoration Plans, Waste Management Plans, Occupational Health and Safety Plans and Good Practise Manuals, may be required depending on the type and significance of the E&S risk.

When a subproject requires an ESIA or ESMP, it should be prepared by the project proponent, using a consultant or environmental expert with sufficient environmental and social expertise relevant to the type of project being proposed, and who is familiar with relevant national requirements for ESIA's and ESMPs.

In particular reference to sub-projects involving aquaculture, and fish processing plants and equipment, they will be required to prepare an Environmental and Social Impact Assessment (ESIA). This is so in order to comply with the requirements established in Seychelles' Environment Protection (Impact Assessment) Regulations of 1996, which stipulate that projects dealing with "fish and associated products farming" require an ESIA.

Table III: ESMF Process and Institutional responsibilities

Phases of BGF and BIF Project Cycles	ESMF Steps	Tools to support ESMF Step	Institutional Responsibilities in Implementing ESMF Step
Prequalification	Administrative Compliance and Eligibility Checks	Annex III, IV	<ul style="list-style-type: none"> • The application passes the administrative compliance at DBS/SeyCCAT. • DBS/SeyCCAT shares application with PIU E&S • The PIU E&S will conduct eligibility checks for compliance with the eligible project activities (Annex IV) advertised in the call for proposals (e.g. if aquaculture projects were not eligible in the call, any submitted would not pass compliance) • For eligible projects, PIU E&S conducts compliance review against the Exclusion list and records in the subprojects tracking table the information related to all the subprojects application that passed the selection (administrative compliance and eligibility checks) • PIU Project Manager reviews each Eligibility report and the subprojects tracking table. • PIU shares the Eligibility reports and subprojects tracking table with DBS/SeyCCAT.
Selection	Environmental and Social Screening	Annex V	<ul style="list-style-type: none"> • All subprojects have to be screened, using the screening form (in Annex V), by PIU E&S. The screening will also include the land title/ lease for the site selected for the subproject when relevant. • PIU Project Manager reviews screening reports and the subprojects tracking table • PIU shares the screening reports and subprojects tracking table with the World Bank (WB) for clearance and with the MEECC for confirmation of risk categorization and the eventual safeguards instruments to be developed; • For aquaculture and fish processing sub-projects listed in Schedule 1 of Environment Protection (Impact Assessment) Regulations of 1996 and any other medium risk subprojects which the WB categorize as requiring an ESIA, PIU prepares TOR for ESIA, and sends them to the WB for technical review and input. • Once finalized, the PIU sends the ToR to the MEECC for clearance as required by Regulations. • For low-risk subprojects, PIU E&S prepares list of applicable mitigation measures.

Phases of BGF and BIF Project Cycles	ESMF Steps	Tools to support ESMF Step	Institutional Responsibilities in Implementing ESMF Step
			<ul style="list-style-type: none"> On the basis of the screening results (cleared), the proponent develops the safeguards instruments as indicated in the screening report. The ESMP (or any supplemental safeguards instrument to be developed from the screening results) is mandatory for any subproject that have moderate or high social or environmental impacts as per the screening results. It (they) would have to be finalized prior to the implementation of the subproject. Subprojects that do not have any social or environmental impacts as per the screening results do not have to develop an ESMP. PIU shares the screening reports and, as applicable, TORs for ESIA with the World Bank for No Objection. PIU shares the non-objected screening reports and, as applicable, TORs for ESIA with DBS/SeyCCAT
Review and Clearance			<ul style="list-style-type: none"> Once the proponent has finalized the requested supplemental safeguards instrument(s), she/he shares it/them with DBS/SeyCCAT; DBS/SeyCCAT shares with PIU E&S The PIU E&S reviews the safeguards instrument(s) (5 working days) developed by the proponent and shares them with the MEECC for validation (10 working days) The validated instruments are shared with WB for No Objection (NO). The supplemental safeguards instruments will be disclosed and consulted upon. This can be done through consultations with potentially affected persons. Disclosure can also happen through normal information sessions as part of the stakeholder engagement plan as well as by disclosing such reports on the DBS/SeyCCAT website.
Bidding and Contract Negotiation	Incorporation of E&S Sustainability into sub-projects Procurement Process	Annexes VI, VIII and VIII	<ul style="list-style-type: none"> PIU provides DBS/SeyCCAT with Environmental, Social, Health and Safety (ESHS) Criteria for Evaluation of Bid Proposals for inclusion in their bid evaluation documents. Based on negotiations with DBS/SeyCCAT, PIU E&S may participate in technical committees for evaluation of bid proposals. DBS/SeyCCAT include E&S safeguards clauses provided by the PIU, including ESHS Conditions of Particular Application and ESHS Technical

Phases of BGF and BIF Project Cycles	ESMF Steps	Tools to support ESMF Step	Institutional Responsibilities in Implementing ESMF Step
			Specifications for Construction, in works contracts.
Monitoring	Environmental and Social Compliance Oversight	Annex IX	<ul style="list-style-type: none"> During subproject's implementation, the PIU E&S conducts site visits to evaluate environmental and social performance of sub-projects using Environmental and Social Compliance Report derived from WB approved ESMP. These site visits may be coordinated with inspections by MEECC and DBS/SeyCCAT staff. PIU sends a copy of completed E&S Compliance Report to DBS/SeyCCAT. In instances of serious noncompliance with environmental and social requirements, PIU E&S will report immediately to the PIU Project Manager who will promptly inform the WB TTL, MEECC and DBS/SeyCATT to bring sites into compliance. PIU sends monitoring reports to World Bank on a six-monthly basis PIU will commission two Independent Environmental and Social Audits of Project Implementation
Incident Reporting			<ul style="list-style-type: none"> The PIU should promptly notify the Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including accidents during civil works and construction activities. Provide sufficient details regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the World Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.

KEY:

DBS: Development Bank of Seychelles

ESHS: Environmental, Social Health and Safety.

ESIA: Environmental and Social Impact Assessment.

MEECC: Ministry of Environment, Energy and Climate Change.

PIU: Project Implementation Unit at Ministry of Finance, Trade, Investment and Economic Planning.

SeyCCAT: Seychelles Conservation and Climate Adaptation Trust.

TOR: Terms of Reference.

Table IV: Delegation of Authority Matrix

	ACTION	PIU	SeyCCAT/ DBS	WB	MEECC	SUBPROJECT PROONENTS	ENVIRONMENTAL CONSULTING COMPANIES/ INDIVIDUAL CONSULTANTS	CONTRACTORS	SUPERVISING ENGINEERS
Prequalification	Administrative Compliance	Review	Prepare						
	Eligibility Checks	Prepare	Review						
Selection	Environmental and Social Screening	Prepare	Review	Clear	Validate	Review			
Review and Clearance	Safeguards Instruments	Review		Clear	Validate	Prepare	Prepare		
Bidding and Contract Negotiation	Incorporation of E&S Safeguards clauses into subprojects Procurement Process	Prepare	Review						
Subproject Implementation	Environmental and Social Compliance Oversight	Prepare	Participate		Participate			Implement	Implement

5.2 Grievance Mechanism

While consultations prior to subproject implementation are intended to reduce the potential for conflicts once subprojects are executed, grievances may arise due to project impacts. The guiding principle for conflict or grievance resolution is to resolve the issue quickly and at the lowest possible level, ideally within the local community using commonly-accepted practices. Measures to address conflicts that may arise as a result of project activities can include both formal and informal mechanisms. It is preferable to resolve such complaints at a local level, within existing community-level grievance or complaint mechanisms, and involving community leaders or local authorities. Local authorities or leaders should provide an audience for aggrieved parties to express their concerns and offer informal resolution solutions. If these measures do not resolve the issue then more formal approaches, including lodging a verbal or written complaints to the PIU.

Requirements for the GRM are as follows: (i) the grievance process must not impose any cost to those raising the grievances (i.e., the complainants); (ii) concerns arising from Project implementation must be adequately addressed in a timely manner; and (iii) participation in the grievance process must not preclude pursuit of legal remedies under the laws of Seychelles.

The GRM process will be managed by a Grievance Committee. The recommended make-up of the Committee is as follows: a staff member of the PIU, such as the Project Coordinator or the E&S Specialist, and the Focal Points that the other ministries (i.e., MAF and MEECC) must designate. None of the members of the Committee should have a conflict of interest involving any complaint lodged. The Committee should have female representation.

Additionally, to ensure that workers grievances are captured during civil works, the contractors will ensure as part of the CESMP that a procedure is set through which a grievance can be raised, assessed, investigated and responded to. The contractor will be responsible to keep record of the grievances submitted and of their status of resolution and will report on the workers' grievances on a monthly base to the PIU.

ANNEX IV: ENVIRONMENTAL AND SOCIAL ELIGIBILITY FORM

Subproject Summary

Proponent:.....

Subproject Name:.....

Subproject Location:.....

Estimated Subproject Cost:.....

Subproject Objectives:.....

Brief Description of Proposed Subproject:

Eligibility check:

For SeyCCAT:

	Yes	No
Does the subproject fall under SeyCCAT Strategic Objective 1? Support new and existing marine and coastal protected areas and sustainable use zones.		
Does the subproject fall under SeyCCAT Strategic Objective 2? Empower the fisheries sector with robust science and knowhow to improve governance, sustainability, value, and market options.		
Does the subproject fall under SeyCCAT Strategic Objective 5? Trial and nurture appropriate business models to secure the sustainable development of Seychelles' blue economy		

For DBS:

	Yes	No
Does the subproject fall under the indicative list of eligible activities to be funded under the BIF?		

Eligibility check against the exclusion list

Any subproject meeting any of the below listed criteria will be ineligible for funding under the SWIOFish3 Project.

Subprojects in Exclusion List	Yes	No
Subprojects located within or adjacent to a protected or an ecologically sensitive area, as defined in Schedule 2 of the Environment Protection (Impact Assessment) Regulations		
Subprojects that involve the significant conversion or degradation of critical natural habitats such as sensitive ecosystems, converting mangrove forests to aquaculture use or other land uses, or other unsustainable cutting of mangrove forests		
The introduction of any new exotic marine species (note: this provision does not apply to any native and/or naturalized species, or any micro-algae that is imported as live feed)		
Activities that could dangerously lead to the exposure of sensitive/critical/vulnerable habitats unsustainable or illegal fishing activities (e.g., illegally-sized nets, spear fishing, use of dynamite, etc.)		
Construction of permanent buildings within the wetlands		

Construction of walls in or around wetlands which will interrupt water flow		
The tidying of wetlands or mangroves by the removal of dead wood that serves as habitat for multiple fish species		
Extraction of raw material from protected areas		
Filling of wetlands within protected areas and outside in strategic landscapes.		
Subprojects which cause significant socioeconomic impacts involving permanent involuntary resettlement resulting in relocation of people or displacement of houses or building structures; or loss, denial or restriction of access to land, crops and other economic assets; or significant loss of sources of income or means of subsistence)		
Subproject which physically block or restrict fishers' access to the water (e.g., structures with walls or other shoreline obstructions or barriers that physically prevent fishers from accessing or launching their boats using customary or longstanding paths, roads or other rights of way)		

Form prepared by:

Signature: _____

Date: _____

Name (print): _____

Job Title: _____

Form approved by:

Signature: _____

Date: _____

Name (print): _____

Job Title: _____

ANNEX V: ENVIRONMENTAL AND SOCIAL SCREENING FORM

Instructions

The Environmental and Social Specialist at the PIU will complete this form for all subprojects proposals. In completing this form, the PIU Environmental and Social Specialist or Consultant may need to consult secondary information sources, other specialists at the MFTIEP or at the other co-implementing ministries (i.e., MFAG and MEECC), and/or the sub-project proponent and undertake site visits if the environmental and social information available is insufficient or if the sub-project is likely to cause significant negative risks.

The PIU Project Manager will give final approval to the completed form.

The proposed category for each subproject, as well as the terms of reference (TOR) for the necessary environmental and social analyses, will be subject to consultation with the Environmental Assessment and Permit Section (EAPS) of the MEECC. In the particular case of TORs for ESIAs, the MEECC through the EAPS must give its formal approval as national environmental authority.

Screening date:

Subproject Location

Country:

Island:

District:

Project Leaders

Ministry: Ministry of Finance, Trade, Investment and Economic Planning

The Blue Economy Department, Vice President's Office

Part A: Brief description of the subproject

- Objective and characteristics of the subproject:
- Type and current land use:
- Land certification/lease:
- Environmental and social activities (done/to be done):

Part B: Identification of environmental and social impacts

Environmental impacts/risks	Yes	No	Remarks
Sector resources			
Is an Environmental and/or Social Assessment required by the law of Seychelles where the sub-project activities are undertaken?			
Does it require vast clearing or acquisition of land areas?			
Will the subproject require large volumes of construction materials from the local natural resources (sand, gravel, laterite, water, wood construction, etc.)?			
Reduced flows or lowering of water table due to abstraction, possibly resulting in salinization?			
Disruption of coastal processes (e.g., wave, tidal and current regime, sediment transport, flood and storm protection) due to inadequate siting of sub-project?			
Introduction of sediments to coastal waters or inland watercourses, or interruption of drainage patterns, as a result of ground clearance, earthworks and operational maintenance of systems?			
Reduction of water availability for human communities and ecosystems due to abstraction of significant volume of water from surface or ground water sources for supply to aquaculture system?			
Dust and emissions from small-scale construction			

activities, and from vehicles and motorized vessels, could affect human health, vegetation and wildlife?			
Biodiversity			
Will the subproject cause impacts on endemic, rare, vulnerable species (i.e. IUCN Red List species) and or important economic, ecological, physical cultural resources and components			
Are there any areas of environmental or ecological sensitivity that could be adversely affected (loss, degradation or fragmentation of protected or ecologically sensitive areas) by the subproject? E.g., forests, wetlands (lakes, rivers, seasonal floodplains), etc.			
Establishment of populations or genetic mixing with wild populations caused by accidental release of cultured species (especially non-native ones), leading to negative impacts on local flora and fauna?			
If the subproject is outside protected areas, but at a short distance from protected areas, could it adversely affect the ecology within the protected area? (e.g. interference with the flight of birds, migration of mammals)			
Degradation of native populations due to spread of diseases from cultured species?			
Further development, increased disturbance and pressure on natural resources due to development of projects in previously undeveloped areas?			
Loss of plant species and habitats of conservation interest due to earthworks and clearance?			
Noise and vibration from small-scale construction activities, and from vehicles and motorized vessels, which may disturb sensitive noise receptors (human and fauna, including fish and marine mammals)?			
Excessive or unregulated capture of a small range of target species and accidental capture of other non-targeted species may deplete stocks and place pressure on local food resources?			
Direct mortality of target and non-target species, leading to depletion of their populations, including involuntary capture in lost nets?			
Geology and Soils			
From the geological or soil point of view are there unstable areas (erosion, landslide, collapse)?			
Excess consumption of materials, generation of wastes/emissions, pollution of soils and water due			

to inefficient waste management during construction, operation and maintenance; in particular, impacts of wastewater contaminated with nutrients and chemicals?			
Loss, damage or disruption of soil/sediments during small-scale construction works?			
Interruption or disruption of surface and groundwater flows from construction, excavation and ground clearance?			
Loss, damage or disruption of soil/sediments during construction and maintenance?			
Release of hazardous substances during construction or maintenance (e.g., accidental spills and leaks) leading to soil, surface or groundwater contamination?			
Are there any areas at risk of soil salinization?			
Landscape/aesthetics			
Will the subproject have any adverse effect on the aesthetic value of the landscape?			
Pollution			
Is the subproject likely to cause high levels of noise?			
Has the subproject the potential to generate significant amounts of solid and liquid wastes? (i.e. waste oils, high BOD effluents, heavy metals, other toxic chemicals, pesticides, fertilizer pollution, etc.)			
If "yes" has the subproject client prepared a plan for waste collection and disposal or management?			
Environmental and social concerns	Yes	No	Remarks
Is there Environmental and Social Management Capacity and Equipment?			
Is there any risk that subproject could affect the quality of surface water, groundwater, drinking water sources			
Has the subproject any potential of affecting the atmosphere and causing air pollution (dust, PM10, various gases such NOx, SO2, etc.)			
Health and Safety			
Will the project require use of a work force?			
Does the subproject have the potential to lead to risks of accident for workers and communities?			
Is there a risk for increased occurrence of communicable diseases, including HIV/AIDS and sexually transmitted diseases (STDs) due to			

interaction between any non-local workers and local communities?			
Does the subproject have the potential to lead to an increase in the population of disease vectors? Malaria, Intestinal and Urinary Bilharzia and others			

Social impacts/risks	Yes	No	Remarks
Land tenure			
Does the site selected for the subproject activities have a land title/ lease?			
Lifestyle			
Does the subproject have any potential of causing alterations in the lifestyle of local people?			
Could the subproject lead to the accentuation of social inequalities?			
Real or perceived disruption to normal community life, through the physical presence of a workforce?			
Does the subproject have the potential to lead to any social conflicts?			
Historical, archaeological or cultural sites			
Has the subproject the potential to displace or damage cultural/archaeological/historical heritage sites?			
Loss of/loss of access to land, resources, assets			
Will the activity require that land (public or private) be acquired (temporarily or permanently) for its development?			
Does the subproject lead to physical displacement of people?			
Does the subproject lead to economic displacement?			
Are the assets/activities affected by economic displacement equivalent to or less than 10% of the PAP's productive assets?			
Does the subproject restrict people's access to legally designated parks and protected areas?			
Can the subproject lead to adverse effects on resources' availability or quality of them?			
Local Incomes			
Does the subproject result in adverse impacts on people livelihoods?			
Does the subproject create temporary or permanent jobs?			
Does the subproject promote and/or create other income generating activities?			
Gender Concerns			
Does the subproject take into account specifically the needs and concerns of women and other vulnerable groups?			
Does the subproject promote the integration of women and other vulnerable groups in its development?			
Stakeholder Engagement and Consultations			

Have stakeholder consultations been initiated?			
Have environmental and social impacts and risks identified been shared with the community/key stakeholders?			
Environmental and Social Capacity			
Is there Environmental and Social Management Capacity?			

Public Consultation and Participation

Have public consultation and participation been conducted?

Yes ___ No ___

If “Yes”, briefly describe the measures taken to this effect.

If no or minimal E&S impacts have been identified from the screening above, no safeguards instrument would be required for the sub-project. In certain cases, the proponent may be required to provide a simplified or develop specific mitigation measures for those minimal impacts.

Part C: Assessment of significance of environmental and social risks and mitigation

For all identified risks, rate the significance of the risk and briefly describe the measures taken to avoid/reduce/mitigate/compensate them.

Use Tables 1 and 2 (in the ESMF) as guides, rate the impact and probability of each risk identified on a scale of 1 to 5, and use table 3 as a guide to rate the significance of each risk				
Potential environmental and social risks	Impact (1-5)	Probability (1-5)	Significance (Low, Moderate, High)	Proposed mitigation measures

Table 1: Rating “Impact” of a Risk

Impacts Category	Description	(Ir)reversible	Cumulative Impacts
None	No impact	No adverse impacts on communities, individuals and/or environment	No
Negligible	The impact has no significant risk to environment either short term or long term	Negligible adverse impacts on communities, individuals, and/or environment	No
Minor	The impact is short term and cause very limited risk to the environment	Limited impacts in terms of magnitude (e.g. small affected area, low number of people affected) and duration (short), may be easily avoided, managed, mitigated	No
Moderate	Impacts give rise to	Adverse impacts on people and/or environment	May or may

	some concern, may cause long term environmental problems but are likely short term and acceptable	of medium magnitude, spatial extent and duration, (mostly temporary, reversible). Such risk levels which can be avoided or have mitigation measures which can reduce the potential impact	not
Major	Impact is long term, large scale environmental risk	Significant adverse impacts on human populations and/or environment. Adverse impacts high in magnitude and/or spatial extent (e.g. large geographic area, large number of people, transboundary impacts, cumulative impacts) and duration (e.g. long-term, permanent and/or irreversible); areas impacted include areas of high value and sensitivity (e.g. valuable ecosystems, critical habitats); adverse impacts to rights, lands, resources and territories of indigenous peoples; involve significant displacement	Yes

Table 2: Rating “Probability” of a Risk

Score	Rating
5	Expected
4	Highly Likely
3	Moderately likely
2	Not Likely
1	Slight

Source: adapted from UNDP, 2016, p. 17.

Table 3
Determining “Significance” of a Risk

Impact	5					
	4					
	3					
	2					
	1					
		1	2	3	4	5
Probability						
Green = Low, Yellow = Moderate, Red = High						

Part D: Project classification and environmental and social assessments

Project classified as category:

A ☐ B ☐ C ☐

Environmental and Social Safeguards Instruments		
Environmental and Social Impact Assessment (ESIA)		
Environmental and Social Management Plan (ESMP)		
Health, Safety Management Plan (HSMP)		
Waste Management Plan (WMP)		
Resettlement Action Plan (RAP)		
Livelihood Restoration Plan (LRP)		
Any other relevant instrument	<u>Yes</u>	<u>No</u>
If yes, indicate E&S instrument?		
No environmental and social work needed		

Form prepared by:

Signature: _____

Date: _____

Name (print): _____

Job Title: _____

Form approved by:

Signature: _____

Date: _____

Name (print): _____

Job Title: _____

ANNEX IX: Environmental and Social Compliance Report

(i) **GENERIC**

Sub-Project Name/Code: _____ Location: _____

Date of Site Visit: _____

Participants in Site Visit: _____

Name and job title of persons contacted: _____

Name and contact information of community members contacted (if applicable): _____

NOTE: A “YES” answer to any of the questions in the table below indicates a non-compliance or impact.

QUESTIONS	ANSWER		BRIEF DESCRIPTION OF IMPACT/NONCOMPLIANCE (INCLUDE LOCATION OF IMPACT)	RECOMMENDED ACTIONS	FOLLOW-UP ON IMPLEMENTATION OF ACTIONS (IF APPLICABLE)
	YES	NO			
ORGANIZATION, REPORTING, TRAINING AND PERMITTING REQUIREMENTS					
Is the Contractor non-compliant with, as applicable, any of the requirements for socio-environmental management established in the works contract and the ESMP (e.g., staffing, management structure, equipment and other material resources (e.g., office space, vehicles,					

computers, field monitoring equipment, etc.), field inspection instruments and procedures, etc.)? (please specify)					
Is the Contractor non-compliant with socio-environmental reporting requirements? (please specify)					
Is the Contractor non-compliant with environmental effects monitoring requirements (please specify)					
Is the Contractor non-compliant with workers environmental, health and safety training and awareness requirements (please specify)					
Is the Contractor non-compliant with the required environmental permitting for the project (e.g., water abstraction, vegetation clearance, etc.) (please specify)					
Is the Contractor non-compliant with Seychellois labour laws and international labour standards, in particular in reference to right to receive just compensation and benefits for work, prohibition of forced and child labour, and prevention of sexual harassment and discrimination in the work place on the basis of gender, religion, social origin, etc.? (please specify)					
Is the contractor failing to report on the grievances submitted by workers					
Is the Contractor failing to employ women or reducing the number of female employees in disproportionate numbers when compared to dismissed men? (please specify)					
Is the Engineer non-compliant with, as applicable, any of the requirements for socio-environmental management					

established in the supervision/consultant contract and the ESMP (e.g., staffing, management structures, field supervision instruments and procedures, and reporting requirements, etc.)? (please specify)					
Is the Engineer non-compliant with socio-environmental reporting requirements? (please specify)					
ENVIRONMENTAL AND SOCIAL IMPACTS					
Is there standing water on the site? If yes, is there reason to believe the water has been standing longer than 4 days? (Standing water breeds insect disease vectors, particularly mosquitoes. It takes 4 days for the malaria-bearing anopheles mosquito to hatch and mature to its flying adult form)					
Is there erosion from the cleared site or from material stockpiles? Gullyng on surrounding lands clearly caused by runoff from the site? (In addition to permanently degrading the site itself, erosion/ runoff from the site can degrade nearby surface waters and damage adjoining lands)					
Are fill, sand, and/or gravel being extracted from waterways or ecologically sensitive areas? (Extracting materials from streambeds and wetlands degrades water quality, ruins critical habitat, alters drainage and flow, and can create standing water)					
Is demolition debris or construction waste disposed in the open? (These wastes can pose physical hazards,					

such as broken glass and rusty torn roofing sheets, and toxic hazards, such as leaded paint, and can create breeding habitat for disease vectors)					
Is there fuel, oil, paint or chemical spills to ground or streams? (Such spills can contaminate soils, surface waters and groundwater)					
Is the site very dusty or noisy? (Dust and noise can have negative impacts on the health of workers and residents located closed to construction site)					
Are operation and maintenance of construction plants inadequate and, hence, there is presence of excessive noise, vibrations, fumes and particle emissions?					
Are sprinklers lacking or damaged in crushing conveyors to spray mist/water on belts during crushing operations to help control dust?					
Are there excessive periods of interruption of access to public transport, or residential, commercial, health or institutional areas and services due to inadequate implementation of traffic control and safety measures during construction?					
Are there damages to public utilities and services lines, mains or pipes, and extended periods of interruption of services?					
Are quarries and borrow pits being operated in an unsafe or environmentally unsustainable manner?					
Is vegetation being cleared in areas beyond those indicated in contract drawings?					
Are there conflicts with local populations due to resource use, in particular water?					

Is there inadequate storage and utilization of top soils?					
Are there unresolved resettlement and compensation issues?					
Are there any manifestations of unintended or unanticipated impacts? (please specify type of impact and location)					
HEALTH AND SAFETY IMPACTS					
Is a well-marked site boundary absent and is an actively controlled access not provided?					
Are good housekeeping practices not in place, and is the site not maintained in a generally orderly condition?					
Are safety signs missing—at minimum, to mark site boundary, hardhat areas, explosion and toxic hazards?					
Is smoking allowed or not restricted to a designated smoking area well away from flammable materials?					
Is First Aid kit missing on site, and there is no one on site familiar with its use and trained in basic first aid?					
Drinking water and sanitary facilities are not provided (or are not very close at hand), including hand-wash station?					
Is personal protective equipment (PPE) inadequate or does it appear little-used (PPE must be adequate and used consistently to fulfil its intended function: helping protect workers against injuries and disease)					
Is scaffolding inadequate (i.e., not able to carry at least 4 times its maximum intended load without settling or displacement)?					
Is scaffolding inadequate (i.e., not on solid					

footing—boxes, loose bricks and stones, etc.)?					
Is scaffolding inadequate (i.e., does not have guardrails, mid-rails and toe boards)?					
Is scaffolding inadequate (i.e., not at least 3 meters from any electric power line)?					
Are scaffolding inspections insufficient (i.e., not inspected each day by a competent manager)?					
Is fall protection inadequate (i.e., there are no guardrails or at least ropes near the edge of floors and roofs where a drop is greater than 2 meters. Where not possible, workers in these areas do not wear a body harness and rope)?					
Are trenches inadequate (i.e., spoils are not maintained at least 1 meter back from edge of trench)?					
Are trenches inadequate (i.e., trench walls are not shored or sloped back for any trench 1.75 meters or deeper)?					
Are trenches inadequate (i.e., for any trench 1.75 meters or deeper, there is not a means of exit (ladder, stair, ramp) at least every 10 meters)?					
Is leaded paint or asbestos in any form used in new construction?					
Are painted surfaces being scraped or sanded? (Paint containing lead is very common in Africa. Scraping or sanding releases lead dust, a toxic health hazard to workers)					
Are asbestos roofing sheets, linoleum, fibreboard ceiling or wall panels or pipe insulation being removed/disturbed? (Asbestos should be assumed to be present					

in all these products. When disturbed, carcinogenic asbestos fibres may be released)					
For rehabilitation or demolition, the contractor failed to check prior to commencing work whether lead-based paint, asbestos (including roofing sheets) and other toxics are present?					
LOSS OF/LOSS OF ACCESS TO LAND, RESOURCES, ASSETS					
Have appropriate livelihood restoration measures been put in place?					
Have all project affected persons (PAPs) been identified, including marginalized groups?					
STAKEHOLDER ENGAGEMENT AND CONSULTATIONS					
Have stakeholder consultations been initiated?					
How many grievances have been registered in the reporting period?					
How many have been resolved?					
GENDER CONCERN					
Does the subproject take into account specifically the needs and concerns of women and other vulnerable groups?					
Does the subproject promote the integration of women and other vulnerable groups in its development?					
OTHER ELEMENTS FROM THE ESMP	YES	NO	REMARKS	RECOMMENDED ACTIONS	OTHER ELEMENTS FROM THE ESMP

MAJOR NON-COMPLIANCES AND IMPACTS, AND RECOMMENDED ACTIONS FOR FOLLOW-UP

Based on the Environmental and Social Compliance Table, list in the table below the major non-compliances and impacts detected, as well as the main actions recommended to address them. This table will serve to prioritize the follow-up of those actions in future oversight visits.

BRIEF DESCRIPTION OF IMPACT/NONCOMPLIANCE (INCLUDE LOCATION OF IMPACT)	RECOMMENDED ACTIONS	FOLLOW-UP ON IMPLEMENTATION OF ACTIONS (IF APPLICABLE)

Report prepared by:

Signature: _____

Date: _____

Name (print): _____

Job Title: _____

Report approved by:

Signature: _____

Date: _____

Name (print): _____

Job Title: _____

(II) FOR RESEARCH ACTIVITIES

Date of site visit: _____

Participants in site visit:

Name and job title of persons contacted:

Name:	Post title:

Name and contact information of community members contacted (if applicable):

Name:	Contact number / Email address

Part A: Organisation, Reporting, Training and Permitting Requirements.

Questions	Answer		Brief Description of the impact / non-compliance	Recommended actions
	Yes	No		
Is the proponent compliant with, as applicable, any of the requirements for socio-environmental management established in the requested safeguards instrument(s) (e.g. staffing, management structure, equipment and other material resources, field inspection				

instruments and procedures, etc.)? (please specify)				
Is the proponent compliant with socio-environmental reporting requirements? (please specify)				
Is the proponent compliant with environmental effects monitoring requirements (please specify)				
Is the proponent compliant with workers environmental, health and safety requirements (please specify)				
Is the proponent compliant with the required environmental permitting for the project (e.g., waste disposal, degradation or fragmentation of protected and ecological sensitive area, etc.?) (please specify)				
Is the proponent compliant with Seychellois labour laws and international labour standards, in particular in reference to right to receive just compensation and benefits for work, prohibition of forced and child labour, and prevention of sexual harassment and discrimination in the work place on the basis of gender, religion, social origin, etc.? (please specify)				
Is the proponent failing to employ women or reducing the number of female employees in disproportionate numbers when compared to dismissed men? (please specify)				

Part B: Environmental and Social Compliance Checklist

Hygiene and First Aid	Yes	No	Remarks	Recommended actions
First aid kits: supply inventory; treatment log; first aid training manual				
First aid certificates posted and valid				
Employees know how to get first aid when				

needed				
Personal Protective Equipment (PPE)	Yes	No	Remarks	Recommended actions
PPE is available, adequate and worn				
Training in PPE use / function				
Drinking water and sanitary facilities provided and very close at hand/ function				
Dehydration and Heat Exhaustion	Yes	No	Remarks	Recommended actions
Plenty of water supply				
Adequate rest period				
Sun cream and protective clothing				
Emergency Plans	Yes	No	Remarks	Recommended actions
List of staff including their phone numbers				
Employees trained and aware of emergency plan for fire, disaster etc.				
Communication equipment (radios, satellite phone, spare batteries/chargers) available and functioning				
Navigation equipment (GPS) available and functioning				
Tide table				
Security	Yes	No	Remarks	Recommended actions
Emergency numbers for internal and external contacts are easily available				
Visitor/contractor rules are in place				
Safety measures are in place for anyone working alone				
Training on workplace violence and harassment				
Safety at sea	Yes	No	Remarks	Recommended actions
Safety equipment (lifejackets,)				
Medication for seasickness				
Staff trained for man overboard recovery plan				
Staff are certified divers				
Staff trained to conduct underwater survey				
Tools and Machinery	Yes	No	Remarks	Recommended actions
Safe operating procedures available				
Proper training given in the safe use of tools				

and machinery				
Hazardous Substances	Yes	No	Remarks	Recommended actions
Hazardous substances are properly labelled, stored and disposed of				
Training on safe use, storage, transport and disposal of hazardous substances				
Waste Disposal	Yes	No	Remarks	Recommended actions
Record types, quantity and composition of waste generated / collected				
Appropriate temporary disposal area for waste				
Quantify waste reuse, recycle and deposited on the landfill				
Biodiversity	Yes	No	Remarks	Recommended actions
Use of equipment/product that can negatively affect the habitat or other species than those targeted by the research (please specify)				
Protocol in place for handling species				
Staff trained in the handling / tagging of species				
Mortality rate related to tagging activity (quantify)				
Others elements from the ESMP	Yes	No	Remarks	Recommended actions

Part C: Major Non-compliances and Impacts, and Recommended actions for follow-up

Based on the Environmental and Social compliance tables, list in the table below the major non-compliances and impacts detected, as well as the main actions recommended to address them. This table will serve to prioritize the follow-up of those actions in future oversight visits.

Brief Description of the impact / non-compliance	Recommended Actions	Follow-up on implementation of actions (if applicable)

Report prepared by:

Signature: _____

Date: _____

Name (print): _____

Job Title: _____

Report approved by:

Signature: _____

Date: _____

Name (print): _____

Job Title: _____

ANNEX XI: Simplified ESMP template

1. Project Description (location, specific activities)

Briefly list the planned activities. Clearly identify the issues to be addressed in terms of potential E&S impacts and the proposed solution (to be retrieved from the concept note and/or full proposal - 500 words max).

2. Risks, mitigation measures and monitoring

Identify and list potential environmental and social risks associated to the project. For each of the identified risks proposed mitigation measures to mitigate these risks and develop indicators to monitor the implementation of the proposed mitigation measures.

Potential risks	Mitigation measures	Indicators to monitor implementation of mitigation measures
Environmental risks		
Example 1. Coral damage from equipment (e.g. BRUV)	Example 1.1. Develop and implement a protocol for the deployment of BRUV	Example 1.1. BRUV deployment protocol provided
	Example 1.2. Train staff in BRUV deployment	Example 1.2. % of staff involved in the project trained in BRUV deployment
Example 2. Target species mortality	Example 2.1. Develop and implement a protocol for tagging of target species	Example 2.1.1. Protocol for tagging of target species provided
	Example 2.2. Train staff in tagging of target species	Example 2.1.2. % of target species died during tagging Example 2.2. % of staff involved in the project trained in tagging of target species
Example 3. Pollution of marine environment from discharges	Example 3.1. Set up and implement a proper waste water treatment system	Example 3.1. % of water samples flagged pollution
	Example 3.2. Train staff in collection of water samples	Example 3.2. % of staff involved in the project trained in collection of water samples
Social risks		
Example 1. Injuries to staff	Example 1.1. Develop a Health and Safety protocol	Example 1.1.1. Health and Safety protocol provided
	Example 1.2. Familiarize staff in health and safety	Example 1.2. % of staff involved in the project informed in health and safety

3. Monitoring Plan

The objective of the monitoring plan is to ensure that the mitigation measures are properly implemented.

3.1. Data collection, analysis and report responsibilities

List personnel or organization responsible for collecting data related to monitoring indicators, processing data and reporting to the PIU.

Example 2. Targeted species mortality

1. Data relating to the indicator will be collected by the proponent and/or SeyCCAT as required.
2. SeyCCAT will process the data and provide a brief monitoring report to PIU
3. If required PIU will collect additional monitoring data

If complex data is required to be collected PIU E&S or/and MEECC (e.g. sewage water analysis).

3.2. Additional support (capacity building, resources etc.)

List the additional support that is required to ensure that the mitigation measures are properly being implemented.

Example 3. Pollution of marine environment

1. MEECC staff provide training for collection of water samples
2. Proponent develop data forms
3. Data collected transferred or stored in appropriate format e.g. excel spreadsheet etc.
4. Seychelles Bureau of Standards analyse water samples

3.3. Monitoring table

For every mitigation measures proposed, list the monitoring indicator, frequency of monitoring, responsible for monitoring and the associated cost. This will ensure early detection of conditions that require additional or alteration in mitigation actions, provide info on progress and results of mitigation.

Mitigation measures	Indicator	Frequency	Responsibility	Cost
Example 3. Set up a proper waste water treatment system	Example 3.1. water quality	Example 3.1. Every two weeks throughout the duration of project	Example 3.1. Proponent	Example 3.1. 15 times @ \$50

3.4. Implementation schedule

Provide a schedule for implementation of the various mitigation measures and activities that will enable for the monitoring of the implementation of the mitigation measures.

Activity	Timeline of Activity										
Mitigation measures											
Example 1.1. Develop health and safety protocol											
Monitoring of the mitigation measures implementation											
Example 3.1. Training for collection of water samples											
Example 3.2. Develop data forms											

4. Grievance Redress Mechanism

In line with the World Bank safeguards policies, the SWIOFish3 project has developed a Grievance Redress Mechanism (GRM) to receive, process and respond to complaints from any person or group of people related to the project or is affected by its activities. The GRM is a system designed to answer questions, clarify doubts and resolve implementation problems and complaints of individuals or groups affected by SWIOFish3 project activities. GRMs are intended to be accessible, collaborative, efficient, and effective in resolving concerns through dialogue, joint fact-finding, negotiation, and problem solving. Grievances can surface at different stages of the project cycle. Some grievances may arise during the project design and planning stage, while others may come up during project implementation. In general, grievances that may be encountered in the implementation of the SWIOFish3 project can be grouped into three categories:

- Grievances related to the changes in access to resources through management plans
- Grievances related to proponents and beneficiaries of the Blue Grants Fund (BGF) and Blue Investment Fund (BIF)
- Grievances related to issues encountered by local communities where project activities are occurring

Individuals or groups affected by the SWIOFish3 subproject can

- complete a “complaint form” which will be made available to the public to formulate their suggestions or complaints. These forms can be withdrawn at the PIU office or download from the project website. Once completed, these forms can be deposited in complaint boxes.
- A line of communication will be made for the public so that they can transmit suggestions and complaints through a call or an SMS;
- Formal letters, emails can also be sent to the PIU;
- Suggestions or complaints can also be formulated during consultation meetings.