



Environmental and Social Management Framework (ESMF)

Enduring Earth: Accelerating Sustainable Finance Solutions to Achieve Durable Conservation

NAMIBIA COMPONENT

GEF Project ID:	11014		
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Executive Summary

Landscape Context

Since 1993, WWF Namibia has supported the Namibia National community-based natural resource management (CBNRM) program, which has become one of the most acknowledged CBNRM approaches in the world. WWF support contributed to the Namibian government developing a legal framework for giving back to communities which had been disempowered during the colonial period both, the management and utilization rights, for the wildlife in the areas where they reside (through the establishment of Communal Conservancies). The establishment of Conservancies is driven by community demand and today is largely supported technically by the Namibian Association of CBNRM Support Organizations (NACSO), of which WWF Namibia is a key financial contributor, and other local implementing partners. Since 1995, WWF's support has been uninterrupted for the last 30 years and presently, through a variety of support mechanisms (ranging from financial and technical support through NACSO partners to direct technical support), WWF supports CBNRM in 86 established Conservancies.

Since 2008 Namibia has been aspiring to setting up a long-term sustainable financing mechanism for the conservancy system. In 2018, a pre-feasibility study conducted in the country established that a "Project Finance for Permanence" (PFP) approach, a unique sustainable funding mechanism to ensure long-term management of conservation areas, could be applied to community conservation areas outside of the state protected area (PA) system, complementing and amplifying inclusive conservation approaches in connected landscape. Consequently, Namibia is now one of the target countries—together with Gabon and the Eastern Tropical Pacific—for the global GEF-financed project "*Enduring Earth: Accelerating Sustainable Finance Solutions to Achieve Durable Conservation*" (WWF ID: G0038; GEF ID: 11014), whose objective is "to catalyse sustainable, long-term investment in globally significant conservation areas in three target locations and enable scaling out of the Enduring Earth¹ approach in additional countries, contributing to 30x30 goals."² In Namibia, the pre-feasibility study established that this unique sustainable funding mechanism could be applied to community conservation areas outside of the state PA system, complementing and amplifying inclusive conservation approaches in connected landscapes.

The formal PFP preparation period commenced in Namibia in July 2021 and, in March 2022, the country progressed to the official "preparation period," which can take up to three years and ends with the closing of a conservation financing deal by members of the Enduring Earth partnership, willing supporting donors and the state and non-state conservation actors in Namibia (a "closing agreement"). The PFP preparation team, composed of WWF US and Namibia as well as TNC staff members, is currently delivering on the standard procedures for the development of a PFP in Namibia, with the closing of the deal foreseen for December 2024.

This GEF project will contribute to the PFP as a sustainable financing mechanism for the Namibian CBNRM/Community Conservancy programme, delivering sustained resources for effective biodiversity conservation and climate mitigation benefits. The financing mechanism will be accessible to all legally registered Community Conservancy compliant with the national legislation, which currently amount to 86 Community Conservancies and could increase to 100, effectively putting 20% of Namibia's land area under conservation status. The detailed systems around the PFP funding mechanism are yet to be developed and agreed to in Namibia, however it is envisaged that a combination of sinking, possibly revolving and an endowment fund component will be established.

The Environment and Social Management Framework (ESMF) presented here applies to the Namibian Component of the global GEF-financed project "*Enduring Earth: Accelerating Sustainable Finance Solutions to Achieve Durable Conservation*" (WWF ID: G0038; GEF ID: 11014). The GEF project in Namibia will mostly be utilized to endow a long-term funding mechanism through a WWF-US led "Project Finance for Permanence (PFP)" approach managed by the Enduring Earth³ team and drawing on a decade worth of experience with such an approach and lessons learnt.⁴ As is required by the GEF, the ESS requirements laid out in this document will apply to the entire scope of the

¹ [Earth for Life | Initiatives | WWF \(worldwildlife.org\)](#)

² For more information on PFP or the Enduring Earth project, please refer to the ProDoc.

³ [Earth for Life | Initiatives | WWF \(worldwildlife.org\)](#)

⁴ [Project Finance for Permanence: Key Outcomes and Lessons Learned | Publications | WWF \(worldwildlife.org\)](#)

endowment fund and will be integrated into the Operating Manual. This ESMF will provide details on how to apply these ESS standards throughout the life of the fund, which will extend beyond the funding timeline of this project.

Environmental and Social Safeguards context

The ESMF for Namibia has been prepared in accordance with WWF's Environmental and Social Safeguards Framework (ESSF) and through guidance and procedures described in WWF's Safeguards Integrated Policies and Procedures (SIPP). It was developed in consultation with the Namibian Ministry of Environment, Forestry and Tourism (MEFT), the members of the Namibian Association of CBNRM Support Organisations (NACSO) and local community conservancy representatives. It is based on the findings from the WWF Environment and Social Safeguards Screening Tool for Landscapes and Seascapes⁵ that was completed as part of WWF's network-level ESSF procedures and was adapted to the GEF requirements as part of the project design (Project Preparatory Grant (PPG) phase). Relevant consultations were carried out by WWF and in-country partners during the WWF network-level ESSF development phase, starting in early 2020 and still ongoing as part of the ESSF process and follow-up. The University of Namibia (UNAM) is currently conducting a country wide community consultation in all 86 registered Community Conservancies, in support of the ESMF and IPPF. Consultations will run throughout 2023.

The GEF project ESMF has been developed on the basis of the WWF country risk categorisation and further detailed project specific risk considerations. It outlines the processes that will be undertaken during the project inception/implementation phases and makes room for additional assessments of potential impacts, and identification and development of appropriate risk management measures, as needs arise.

Namibia's ESSF risk screening took place over a consultative period between 2019 and 2021 and the Namibia Risk Categorization Memorandum (Cat Memo)—which categorized the Namibia landscape as "medium" risk—was issued in November 2021. The ESSF contains guidance on measures and plans to avoid negative impacts, and where avoidance is not possible, to reduce, mitigate and/or offset adverse risks and impacts.

This ESMF identifies the steps that will be followed during the inception/implementation phases for the GEF project. Furthermore, it sets out proposals for a framework that will be followed by the long-term financing mechanism e.g. through a transparent application process for grants by local communities and service providers, including site and activity specific ESMPs, as appropriate.

The WWF Namibia Cat Memo identifies that two Substantive Safeguard Standards are triggered:

1. Indigenous Peoples
2. Community Health, Safety & Security

Further four process standards apply, namely: Environmental and Social Risk Management (ESRM), Consultation and Disclosure, Community Stakeholder Engagement and Grievance Mechanism.

This ESMF includes an IPPF, as the project inherently engages Indigenous Peoples. Further, a gender analysis and action plan have been prepared as stand-alone documents and summary information is included here.

⁵ [Environmental and Social Safeguards Framework | Publications | WWF \(worldwildlife.org\)](#)

List of Abbreviations

ACHPR	African Commission on Human and Peoples' Rights
AGM	Annual General Meeting
BEL	Business, Enterprise and Livelihoods (Working Group)
CBNRM	Community-based Natural Resource Management
CC	Community Conservancy
CCFN	Community Conservation Fund Namibia
CEDAW	Convention on the Elimination of All Forms of Discrimination Against Women
CFM	Conservation Fund Manager
COVID-19	Disease caused by novel coronavirus, SARS-CoV-2
EE	Enduring Earth
EIA	Environmental Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Safeguards
ESSF	Environmental and Social Safeguards Framework (WWF)
ETP	Eastern Tropical Pacific
EU	European Union
FAO	Food and Agriculture Organisation of the United Nations
FPIC	Free, prior and informed consent
GAAP	Gender Analysis and Action Plan
GBV	Gender-based Violence
GDI	Gender Development Index
GEF	Global Environment Facility
GII	Gender Inequality Index
GIS	Geographic Information System
GRM	Grievance Redress Mechanism
GRN	Government of the Republic of Namibia
HDI	Human Development Index
HWC	Human-Wildlife Conflict
ILO	International Labour Organisation
IP	Indigenous Peoples
IPLC	Indigenous Peoples and Local Communities
IPPF	Indigenous Peoples Planning Framework
IPP	Indigenous Peoples Plan
IRDNC	Integrated Rural Development & Nature Conservation
KAZA	Kavango-Zambezi Transfrontier Conservation Area

KfW	Kreditanstalt fuer Wiederaufbau
KM	Knowledge Management
LAC	Legal Assistance Centre
LE	Law Enforcement
LtC	Leading the Change
MEFT	Ministry of Environment, Forestry and Tourism
M&E	Monitoring and Evaluation
MGEPEWSW	Ministry of Gender Equality, Poverty Eradication and Social Welfare
MPI	Multi-dimensional Poverty Index
N4L	Namibia for Life
NACSO	Namibian Association of CBNRM Support Organisations
NBSAP	National Biodiversity Strategy and Action Plan
NGO	Non-governmental Organisation
NNF	Namibia Nature Foundation
NPC	National Planning Commission
NRM	Natural Resource Management
NRWG	Natural Resource Working Group
OECD	Organisation for Economic Co-operation and Development
OHS	Occupational Health & Safety
PA	Protected Area
PEW	Pew Research Centre
PFP	Project Finance for Permanence
PIA	Project Implementation Agreement
PIF	Project Identification Form (GEF)
PIR	GEF Project Implementation Report
PMU	Project Management Unit
PPR	Project Progress Report
SADC	Southern African Development Community
SC	Steering Committee
SEAH	Sexual Exploitation and Abuse and Sexual Harassment
SEDA	Socio-Economic Development Action
SEP	Stakeholder Engagement Plan
SIGI	Social Institutions and Gender Index
SIPP	Safeguards Integrated Policies and Procedures
SOPP	Standard Operations Policies and Procedures
TNC	The Nature Conservancy
UNAM	University of Namibia
UNDP	United Nations Development Programme

UNESCO	United Nations Educational, Scientific and Cultural Organization
WWF	World Wildlife Fund

1 Introduction

1.1 Landscape Context

Since 1993, WWF Namibia has supported the Namibia National community-based natural resource management (CBNRM) program, which has become one of the most acknowledged CBNRM approaches in the world. WWF support contributed to the Namibian government developing a legal framework for giving back to communities—namely, those that had been disempowered during the colonial period—both the management *and* utilization rights for the wildlife in the areas where they reside through the establishment of Communal Conservancies. The formation of these Conservancies is a process driven by community demand and is nowadays largely supported technically by the Namibian Association of CBNRM Support Organizations (NACSO⁶), of which WWF Namibia is a key financial contributor, and other local implementing partners. Since 1995, WWF’s support has been uninterrupted for the last 30 years and presently, through a variety of support mechanisms (ranging from financial and technical support through NACSO partners to direct technical support), WWF supports CBNRM in 86 established Conservancies (Figure 1).

Since 2008 Namibia has been aspiring to setting up a long-term sustainable financing mechanism for the conservancy system. In 2018, a pre-feasibility study conducted in the country established that a “Project Finance for Permanence” (PFP) approach, a unique sustainable funding mechanism to ensure long-term management of conservation areas, could be applied to community conservation areas outside of the state protected area (PA) system, complementing and amplifying inclusive conservation approaches in connected landscape. Consequently, Namibia is now one of the target countries—together with Gabon and the Eastern Tropical Pacific—for the global GEF-financed project “*Enduring Earth: Accelerating Sustainable Finance Solutions to Achieve Durable Conservation*” (WWF ID: G0038; GEF ID: 11014), whose objective is “to catalyse sustainable, long-term investment in globally significant conservation areas in three target locations and enable scaling out of the Enduring Earth⁷ approach in additional countries, contributing to 30x30 goals.”⁸

This Environment and Social Management Framework (ESMF) applies to the Namibian Component of the global GEF-financed project, where it will support a sustainable financing mechanism to CBNRM and will be mostly concerned with the endowment of a long-term funding mechanism through a WWF-US led PFP approach managed by the Enduring Earth team and drawing on a decade worth of experience with such an approach and lessons learnt.⁹ Aiming to develop the first PFP in the developing world to focus on community conservancies¹⁰ as an area-based management strategy, the project will channel resources to an endowment (target capitalization to be determined during project development) that would ensure long-term M&E of the investment; fully-fund the provision of critical extension services in perpetuity to strengthen community-based natural resource management in Namibia; and deliver community-driven protection and conservation impact in approximately 100 communal conservancies covering an estimated 20M hectares of land. Additionally, a transition/sinking fund would support the provision of extension services during the project cycle.

The Project strategy is centred on socially-inclusive, multi-stakeholder collaboration at national, regional and local scales; evidence-driven decision-making and management approaches, based on integrated social, economic and ecological research; implementation of innovative, fit-for-purpose technologies and best-practices that enhance capacity for community conservation and CBNRM, prevention and management of wildlife crime and human-wildlife conflict; and entrepreneurship and sustainable business models that enable rural communities to gain greater benefits from wildlife conservation through diversified value chains.

⁶ www.nacso.org.na

⁷ [Earth for Life | Initiatives | WWF \(worldwildlife.org\)](https://www.worldwildlife.org/initiatives/earth-for-life)

⁸ For more information on PFP or the Enduring Earth project, please refer to the ProDoc.

⁹ [Project Finance for Permanence: Key Outcomes and Lessons Learned | Publications | WWF \(worldwildlife.org\)](https://www.worldwildlife.org/publications/project-finance-for-permanence-key-outcomes-and-lessons-learned)

¹⁰ The Great Bear First Nations Protected Area in Canada has previously taken a community conservation approach.

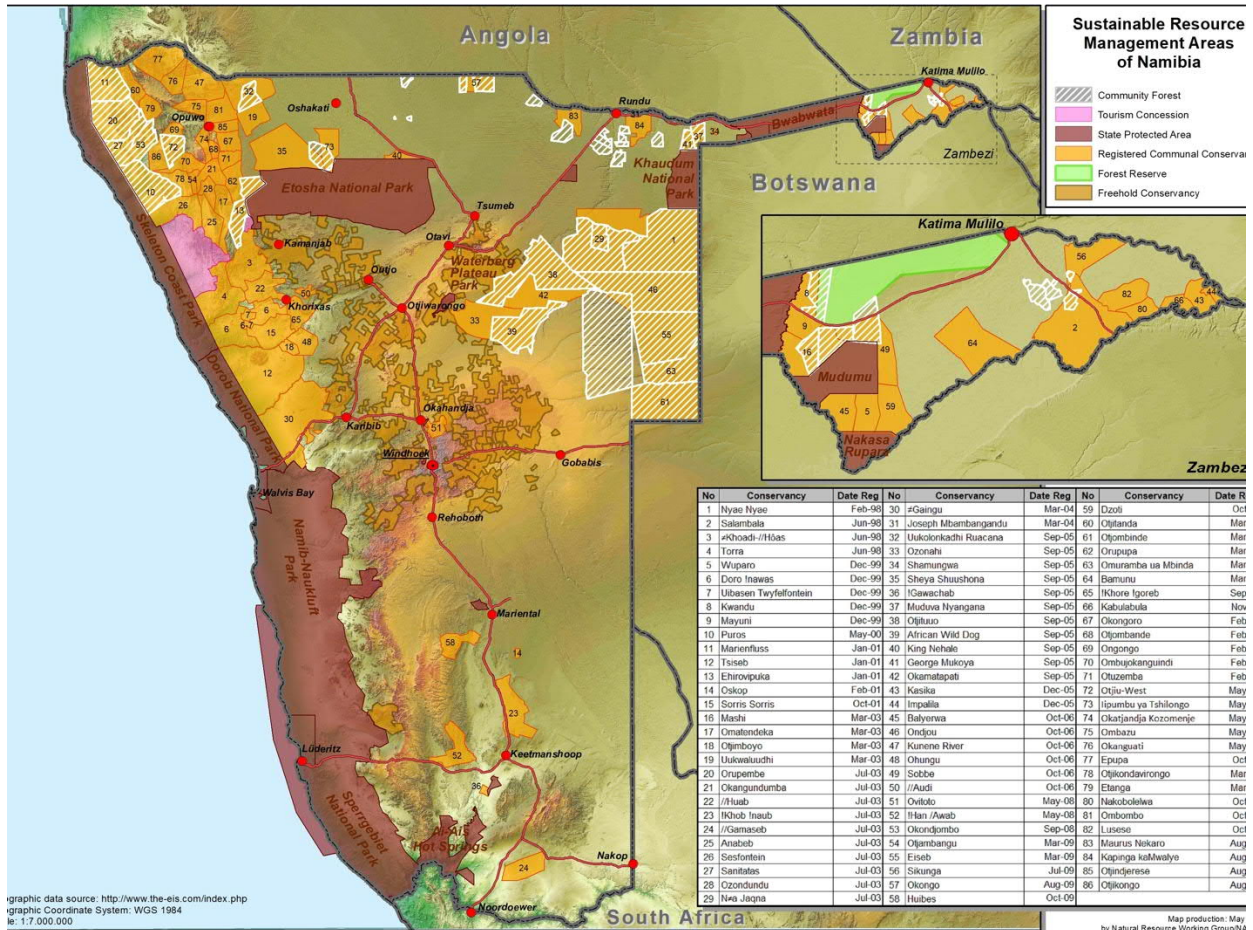


Figure 1: Map of the Namibian Protected Areas network, spanning over nearly 40% of the land area and including the 86 Community Conservancies, which alone cover over 20% of land mass. They are the focus of this PFP.

1.2 Objective and scope of the Environmental and Social Management Framework (ESMF)

This ESMF is a management tool to assist in managing potential adverse environmental and social impacts associated with activities of this WWF-supported GEF funded Project, in line with the requirements of the WWF Environmental and Social Safeguards Framework (ESSF).¹¹ The implementing partners of the Project and the Project Management Team will follow this ESMF to ensure the environmental and social risks and impacts are fully assessed and management measures are in place prior to the implementation of the relevant Project activities. The ESMF has been developed on the basis of the WWF Namibia ESS Screening Tool applied from 2019-2021 and the resulting WWF ESS Risk Categorization Memorandum for Namibia, issued in November 2021, as well as GEF ESSF Risk screening undertaken during the development of the Project Identification Form (PIF).

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

¹¹ Environmental and Social Safeguards Framework | Publications | WWF (worldwildlife.org)

occur during project activities. Site-specific and activity focused ESMPs will be developed pursuant to the guidance provided by this ESMF during project implementation as appropriate.

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 Safeguarding against Sexual Exploitation and Abuse and Sexual Harassment (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.

Please note: As is required by the GEF, the ESS requirements laid out in this document will apply to the entire scope of the endowment fund and will be integrated into the Operating Manual. This ESMF will provide details on how to apply these ESS standards throughout the life of the fund, which will extend beyond the funding timeline of this GEF project.

1.3 Objective of the Indigenous Planning Framework (IPPF)

The target project areas include indigenous groups, particularly the San and Himba peoples, who are considered as Indigenous Peoples (IP) under WWF's Indigenous People's Policy and Safeguards. Due to their presence, WWF requires additional consideration and support for their rights consistent with both WWF's policies and the recognition afforded to them by the Government of Namibia. As such, an Indigenous Peoples Planning Framework (IPPF) thus has to be prepared.

The objective of the IPs Planning Framework (IPPF) is to clarify the principles, procedures and organizational arrangements to be applied to IPs for the entirety of the lifespan of the endowment fund this GEF project is presently establishing. This framework will serve as a guideline to the project team to:

- Enable them to prepare an Indigenous Peoples Plans (IPPs) for specific activities proposed consistent with the GEFs and WWF's Environment and Social Safeguard Integrated Policies and Procedures.
- Engage affected IPs in a Free Prior and Informed Consent (FPIC) process.
- Enable IPs to benefit equitably from the project.

1.4. ESMF, IPPF and Gender Analysis Preparation Methodology

The ESMF, IPPF and Gender Analysis were prepared based on the following information: (1) the WWF Namibia Risk Categorization Memo of 2021, and all submitted review information leading to the categorization, including the WWF ESS Screening Tool for Landscapes and Seascapes produced in 2020; (2) GEF ESSF Risk screening undertaken during the development of the PIF; (3) various project ESS reviews/reports for donor projects currently executed within the Community Conservancy (e.g. KfW, FAO, EU, OAK, among others). This document has been developed on the basis of past community-level consultations (see Table 1) and in consultation with national NGO partners under

the NACSO umbrella. WWF Namibia is part of a NACSO member coordination group on ESS, IPP and gender related matters, attempting to set out one national approach to ESS and IPP in community conservancies. In support of such, WWF Namibia has commissioned the University of Namibia (UNAM) to lead consultations in all 86 Community Conservancies with regard to ESS, IPP and gender. The consultations will be conducted throughout 2023 and will conclude in November. Outcomes from the consultancy will update the analysis of project-related risks relevant to communities and Conservancies, and will help inform the future development of ESMPs, IPPs and any other applicable plans, as laid out in this document.

Table 1: Overview list of consultations on PFP/N4L in Namibia, including feedback on potential ESSF related concerns. See Stakeholder Engagement section for full details.

Dates	Participants
August 19, 2021	Director of Wildlife and National Parks, Ministry of Environment, Forestry and Tourism (MEFT); with WWF Namibia.
August 30, 2021	NACSO Executive Committee; with WWF Namibia.
October 8, 2021	Director of Wildlife and National Parks and Deputy Executive Director (MEFT); with WWF Namibia.
February 23-24, 2022	Zambezi Regional Conservancies Biannual Meeting - 98 participants from conservancies, traditional authorities, government, NGOs (including WWF), private sector, KAZA partners.
March 2-3, 2022	Over 20 participants, incl. NACSO members, MEFT, CCFN, and WWF.
March 3, 2022	Executive Director, MEFT, and GEF OFF; Director of Wildlife and National Parks; with WWF Namibia.
March 14, 2022	Over 20 participants, incl. NACSO members, MEFT, WWF, and KAZA rep.
March 17-20, 2022	Ombonde People's Park visit: WWF met with the Chairperson for Ehi Rovipuka Conservancy; Chairperson for Omatendeka Conservancy; IRDNC Kunene People's Park/Landscape Coordinator; IRDNC Assistant Director and IRDNC Executive Director.
March 23, 2022	WWF with ED, MEFT, and GEF OFF; and Director of Wildlife and National Parks (MEFT).
March 23, 2022	WWF with Minister, MEFT and senior staff, including the Executive Director (ED) and some Directors.
March 23, 2022	Multidimensional Poverty Dialogue involving over 20 participants incl. MEFT, NPC, NGOs, UNAM, Media rep.
March 31-April 8, 2022	Online exchange involving over 40 participants from CBNRM stakeholders to select name for PFP
May 16, 2022	Extension Services Plan kick-off meeting with 28 participants incl NACSO members, MEFT and CCFN
May 18, 2022	ESS mitigation planning training by WWF US ESS team for over 20 participants incl NACSO members and MEFT
June – September, 2022	Several planning sessions with a core team of 10 people representing NGOs and MEFT to prepare for the in-person Extension Services Workshop in September 2022.
July 20-21, 2022	Zambezi Biannual Meeting attended by over 100 participants from 16 registered and 4 emerging conservancies; and Traditional Authorities in Zambezi; 2 visiting conservancies from Kavango East; community and support entity reps from Angola, Botswana and Zambia. MEFT; IRDNC, NNF, WWF, BFS, Kwando Carnivore Project.
August 5, 2022	WWF Namibia meeting with NPC ED, Chief Development Advisor, Development Partners Coordination, and Head of Multilateral Programmes, under Development Cooperation.
August 31, 2022	Kavango East and West Conservancies update on N4L and LtC - SIDA
Sept 1, 2022	WWF Namibia meeting with KfW

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Sept 5-7, 2022	WWF and BFS met with Ombonde People's Landscape Board and IRDNC Kunene staff.
Sept 26-29, 2022	National Extension Services Plan Workshop involved over 70 participants from conservancies, government, NGOs, (the latter two including a mix of national and regional / field level staff).
Oct 12, 2022	N4L update at North Central community Conservation landscape Peer review ,Learning and sharing Workshop
Oct 2022	US donor briefings
Nov 10, 2022	WWF Namibia meeting with KfW, incl CCFN review team from Germany.
Dec 5-9, 2022	NACSO WGs Coordination and Annual Planning Week attended by 40 representatives from MEFT, NACSO partners, and Projects, to provide progress updates/feedback on 2022 activities by the regional field-based staff and working groups; and develop a common work plan for supporting Governance, NRM, and Enterprises. Work session on GEF ESFM, IPP and Gender Plan
Jan 23-27, 2023	Kunene Biannual Meeting attended by over 50 participants from conservancies; Traditional Authorities; and technical support staff from NGOs and government.
Feb 15-17, 2023	Zambezi Biannual Meeting was attended by over 100 participants from 16 registered and 5 emerging conservancies; 4 community forests and Traditional Authorities in Zambezi; Gondwana Collection (tourism operator); community and support entity reps from Angola, Botswana and Zambia. MEFT; IRDNC, NNF, WWF, UNAM, Kwando Carnivore Project and NCE (Namibian Chamber of the Environment).
Feb 15 & 16, 2023	Nacso Head of Organizations meeting & special work session with WWF. Update on GEF 7 project proposal development incl ESFM and IPP.
Mar 29 & 30, 2023	Nacso Head of Organizations meeting & AGM, Update on GEF 7 project proposal development incl ESFM and IPP.
15 June, 2023	Project Validation meeting

The ESMF/PF/IPPF draws on consultations results, and on the relevant laws and regulations of the Republic of Namibia and the ESSF and SIPP. The relevant laws and regulations of the Republic of Namibia related to safeguards apply to the project since it is implemented within the jurisdiction of the Republic of Namibia. WWF's SIPP apply since the project is managed by WWF, which is an implementing agency of GEF.

It should be noted that, because the precise scope of the activities that will be funded by the GEF supported Endowment Fund in the future is still being defined, this analysis is to be seen as a preemptive listing of potential impacts, which will be considered once fund distribution will commence, likely from 2030 onwards. While the project's "single close" (refer to ProDoc for further details) is foreseen for December 2024, at least five years are earmarked for the "maturation" of the endowment fund – only after which the actual payouts for the critical support services will commence.

However, given that GEF standards apply to the entirety of this project—namely, to all the funding in this PFP and not just to the GEF-supported Endowment Fund—in the event that those critical support services begin implementation via other funds available to this project prior to the availability of the GEF funding, the provisions in this document will become effective at that time.

In order to avoid duplications and for ease of reference, the ESMF and IPPF are combined into a single document. A stand-alone gender analysis and action plan have been developed.

2 Project Description

This chapter outlines the objectives of the “*Enduring Earth: Accelerating Sustainable Finance Solutions to Achieve Durable Conservation*” (WWF ID: G0038; GEF ID: 11014), its components, milestones and major supported activities as they apply to Namibia, one of the three geographic concentrations of the broader project’s scope.

2.1 Project Objectives and Components

The overall project objective is “*To catalyse sustainable, long-term investment in globally significant conservation areas in three target locations and enable the scaling out of the Enduring Earth approach in additional countries, contributing to the 30x30 goals.*”

The global project is designed to have three components. However, the Namibia component is only addressing outcomes 1 and 3 of project Component 1 as well as in M&E and knowledge management (Component 3). All activities under these components are part of the standard PFP development and Namibia has already co-financing for most of these activities and is already implementing an official PFP preparation grant (see below). The GEF funding will be used for the capitalization of the Endowment Fund (see below).

Outcome 1.1.: Conservation goals, funding package and project conditions agreed by key stakeholders (including government, donors, NGO partners) in target countries, for improved financial sustainability and management of priority conservation areas in Gabon and Namibia

1.1.1 Institutional capacity assessments, capacity strengthening plan and training for key organizations responsible for the priority conservation areas, to design, receive and execute the PFP

1.1.2 Conservation plan, community engagement plan and financial model for target country PFPs

1.1.3 Operating manual, including institutional and governance arrangements for each PFP

1.1.4 Single close signed by parties to the deal

Outcome 1.3.: Transition, sinking and/or endowment fund(s) capitalized to invest in improved management effectiveness in priority conservation areas

1.3.1 Establishment and capitalization of a transition, sinking and/or endowment fund in each country for improved management of priority conservation areas

Outcome 3.1.: Effective project knowledge management and M&E contributes to efficient decision making and adaptive project management

3.1.1 Project lessons and KM products

3.1.2 Project M&E Plan informs adaptive project management

In Namibia, this project focuses on capitalizing an Endowment Fund in order to fund extension services for community conservancies in perpetuity. Community conservancies have been established in Namibia since the late 1990s. The 1995 Policy for Wildlife Management, Utilisation and Tourism in Communal Areas laid the foundation for the legislation (Act No. 5 of 1996: Nature Conservation Amendment Act, 1996), which empowers rural communities to form communal conservancies, to contribute and directly benefit from conservation (see below, Section 2.2 for details). As of 2023, 86 Communal Conservancies have been legally registered and are operational throughout the country. They double the area dedicated to conservation in Namibia (Figure 1), complementing the State Protected Area (SPA) network and bringing the land area under conservation status to 38,7%¹².

Through the Enduring Earth partnership, an endowment fund is being established to guarantee the effective delivery of key services by Community-based Natural Resource Management (CBNRM) support organizations

¹² Excluding proclaimed and emerging Marine Protected Areas (MPAs).

(NGOs/Government) and the local Community Conservancies, supporting compliance of the Conservancies with the Namibian law. A detailed Conservation Plan is currently under development and aiming at the establishment of a comprehensive support package that ensures the protection of existing and potentially emerging communal conservancies, envisaged to reach up to 100 registered entities by 2030. The extension services include the following, in line with the law:

- Natural Resource Management and Monitoring: Mapping, management plans, quota setting, hunting concessions, harvesting systems, human wildlife conflict mitigation, fire management, anti-poaching systems, game censuses and introductions, monitoring systems, law enforcement support, etc.
- Institutional Development and Governance: Legal and policy support, conservancy establishment, stakeholder engagement, conflict resolution, learning exchanges, and training on constitution implementation and amendments, Annual General Meetings, financial management and reporting, advocacy, etc.
- Business, Enterprise, & Livelihood Services Tourism planning, business planning and feasibility assessments, marketing, environmental assessments, tax assistance, contracts, insurance, product development, training on: finance and administration, communications, negotiations, infrastructure maintenance, etc.

The Conservation Plan of the PFP or "Service Plan" is the planning foundation for this component. Notably, an additional transition fund is being pursued that will finance these extension services from January 2025 to 2030, during the five years maturation period foreseen for the Endowment in the closing conditions. As stated, because GEF EES Standards apply to all the funding available to this project, this ESMF is applicable to both the period of maturation and execution of the endowment fund.

In addition to the above, the PFP explores the opportunity to develop the following two funding mechanisms (with non-GEF resources):

1. Socio-economic development investments in Conservancies: sinking fund

The socio-economic development fund under the PFP is vital to contribute to socio-economic development of indigenous people and local communities IPLC in conservancies. The objective of this fund is to support green socio-economic development investments that would support Namibia's communal conservancy members in their development aspirations. Agriculture, Fisheries, green energy, tourism sector investment are considered, on a grant or loan basis. Feasibility studies are being undertaken during the PFP preparation phase.

2. Payments for conservation services through Wildlife credits: sinking/revolving fund

These are direct conservation performance payments to local communities who set aside and manage exclusive wildlife areas for conservation, tourism & socioeconomic benefits, inter alia in Community Conservancies. They entail a contract between any conservancy and the funding agency (currently the Community Conservation Fund of Namibia) with guidelines for managing a "Wildlife Landscape". This is a non-tourism dependent incentive for community members to protect and manage wildlife and wildlife habitat. Conservancies must demonstrate conservation performance based on agreed terms (e.g., level of patrolling effort, ensuring integrity of wildlife habitat, etc.). Independent, transparent verification led by technical advisory panel that includes government and NGOs. This concept is already being tested and currently furthered as a potential PFP component.

As noted, the GEF 7 funding is specifically supporting project Component 1 of the Global project: Deploying Project Finance for Permanence (PFP) for priority conservation areas in Namibia through the endowment contribution to the extension services.

The draft extension services goal is: Every year, access to critical extension services enables at least 80% of conservancies to meet at least 80% of the following applicable requirements:

1. Hold an Annual General Meeting (AGM) each year as per their conservancy constitution

2. Conduct Conservancy Committee elections as required by their conservancy constitution
3. Produce and submit satisfactory (adopted by conservancy members at the AGM) annual financial statements (and audits if required by their own conservancy constitution) that show that expenditures are within the approved budget
4. Manage wildlife as per the approved Wildlife Management and Utilisation Plan, and submit the Wildlife Utilisation Report annually to MEFT
5. Generate and distribute benefits according to their own Benefits Distribution Plan and procedure as per their conservancy constitution

In the past, these services were supported through ad hoc funding by donor projects. However, due to a changed funding landscape and a desire to set up a long-term sustainable mechanism, an endowment option is being pursued.

2.2 Project Area Profile

Namibia's ecological and social significance: Namibia is one of the few dryland countries in the world with internationally recognized biodiversity hotspots.¹³ With ecosystems spanning four terrestrial biomes (desert, Nama and Succulent Karoo, Acacia savanna, broad-leaved savanna) and two aquatic biomes (coastal marine, wetlands), Namibia is a wildlife-rich country with remarkable species diversity and high levels of endemism.¹⁴ It is home to the largest free-roaming population of black rhino in the world, the largest cheetah populations, populations of desert-adapted elephants and lions, painted dogs, and pangolin. As the most arid country south of the Sahara, high variability of rainfall is one of the leading influences on biodiversity. The greatest overall terrestrial species diversity is found in the more tropical areas of north-eastern Namibia, while areas of high endemism are mainly concentrated in the arid and semi-arid west and central and southern parts of the country. Each of the country's biomes are affected by land uses such as agriculture, tourism, recreation, mining, and development.

Namibia's model of community conservation is widely recognized as one of the world's greatest conservation success stories. Prior to Namibia's independence in 1990, under South African colonial rule, all wildlife belonged to the Government, and communities did not have rights to utilize wildlife or other natural resources. There were few incentives for communities to protect wildlife. Heavy poaching and major drought in the 1970s and 1980s led to considerable wildlife declines. During the 1980s, visionary conservationists collaborated with local headmen in select communities to appoint community game guards to address poaching. In the early 1990s, with support from USAID, WWF helped develop a pioneering Community-Based Natural Resource Management (CBNRM) system. Critical to the CBNRM system's success was the adoption of the 1996 Nature Conservation Amendment Act, which gives Namibians the right to manage and benefit from their wildlife through the creation of Community Conservancies.

Community Conservancies are areas outside of State Protected Areas with defined borders, governance, and management structures. There are currently 86 established Conservancies in Namibia, with 10 or more emerging, comprised of and managed by Indigenous People and Local Communities (IPLCs). The Conservancies are legally recognized by the Namibian Ministry of Environment, Forestry, and Tourism (MEFT), and the Ministry monitors compliance with legal requirements. Existing Community Conservancies cover 20.2% of the land area (16.6M ha) in Namibia. Over 238,000 Namibians (9% of the total population) depend on conservation for their livelihoods.

Conservancies play a significant role in managing these corridors, particularly in Namibia's relatively densely populated, fertile Zambezi region.¹⁵ For example, Conservancies provide connectivity across the Kavango-Zambezi Transfrontier Conservation Area from Namibia to Botswana, Zambia, and Angola – connections vital for the world's

¹³ Some of Namibia's most ecologically important areas include the Tsau/Khaeb National Park, including the Succulent Karoo ecosystem; the Namib escarpment zone; four Ramsar Wetland Sites; and two World Heritage sites, the Namib Sand Sea and Twyfelfontein, home to ancient rock engraving.

¹⁴ Approximately 20% of Namibia's biodiversity is endemic.

¹⁵ MEFT launched the Zambezi Wildlife Corridor Strategy in October 2021.

largest population of elephants as well as other species. Further corridors in the Khaudum-Nyae-Nyae-Ngamiland region are possible, which would lead to connectivity between the Okavango Delta (a UNESCO World Heritage Site) and Etosha National Park. Long-term investments would enhance connectivity management by allowing removal of border and veterinary fences, as well as fences delineating property boundaries.

Threats to Biodiversity and Wildlife: Changes in climate, increasing pressure for resource extraction, and human-wildlife conflict all threaten Namibia's biodiversity. Community Conservancies have proven effective in managing natural resources sustainably; however, ongoing investment to build capacity and foster collaboration among partners is needed. Primary threats include the following:

- *Drought & Human Wildlife Conflict:* Prolonged dry cycles are natural in Namibia;¹⁶ however human-wildlife conflict increases during drought, when livestock and wildlife compete for grazing and water. Most conflicts consist of wildlife attacks on livestock—averaging approximately 6,000 incidents per year since 2015—though crop raiding and loss of life from elephant, crocodile, lion, and hippo also occur frequently.¹⁷ Well-intended but poorly planned placement of water holes or tanks exacerbate this problem by causing wildlife and livestock to stay proximate to drought-stricken areas. It is anticipated that recent climate trends, including more intense periods of drought, will continue to affect southern Africa.
- *Poaching:* Poaching, particularly of Namibia's iconic black rhinos and elephants, has worsened since COVID-19 due to decreased patrolling by Conservancy game guards and an absence of tourist activities. As new wildlife corridors are created, increased wildlife ranger support is required, as well as coordinated anti-poaching efforts.
- *Unsustainable Natural Resource Management:* Overgrazing, livestock encroachment, and over-extraction of water from groundwater and perennial rivers threaten wildlife. Some Conservancies are also impacted by unsustainable agricultural production (e.g., slash-and burn techniques), the encroachment of small-scale plots into community-managed wildlife areas, illegal timber harvesting (particularly in the northeast, bordering Angola and Zambia), and, at times, damaging development projects.
- *Resource Extraction & Competing Demands for Land Use:* Demand for Namibia's mineral resources, including uranium, oil and gas, copper, gold, and iron, is increasing. While many prospecting licenses currently lay dormant, land set aside for conservation purposes is being opened for extractive use, including in Conservancies. Poor cross-sectorial planning and implementation of plans is a key concern; local Conservancies are not adequately included in high-level decision-making processes, which often leads to conflicting land uses. Conservancies require increased capacity building to properly address this threat.
- *Need to Re-Value the Wildlife Economy:* Wildlife can damage crops, harm livestock, and even kill people, and these losses can lead to the perception that biodiversity is a direct threat to livelihoods, rather than a potential source of income. This is especially true in some of the poorest parts of the country where returns and benefits from wildlife do not yet cover the losses generated from human-wildlife conflict. Additionally, upholding effective management of natural resources is not automatically instilled in the next generation. To offset these real concerns, communities need to derive benefits from wildlife and from conservation. Data show that if benefits from the wildlife economy are sufficiently high, residents are more tolerant of problem-causing species.¹⁸

¹⁶ Namibia's northwest region recently experienced one of the hardest and longest droughts in human history; wildlife populations were affected. Climate change effects on natural weather patterns in Namibia are an ongoing area of study.

¹⁷ Community Conservation Namibia. (2023). *The Big Issue - Human Wildlife Conflict*. <https://communityconservationnamibia.com/the-big-issues/human-wildlife-conflict>

¹⁸ In the Nyae Nyae Conservancy, elephants regularly damage infrastructure and compete with people for bush foods. However, there are also strong mitigation methods (e.g., predator-proof kraals and elephant-proof water points). Sufficient income is generated from wildlife-based tourism and trophy hunting leading to community support for coexistence. Conservancy members say that they wish to live with elephants because they represent income and employment.

2.3 Demographic and economic information

Namibia is a geographically large country of 825,615 km², with a population of about 2.53 million (2021) and one of the lowest population densities world-wide (3 per km²). Namibia borders Angola, Botswana, South Africa, and Zambia. It is the most arid/driest country in Sub-Saharan Africa, and water is limited with few perennial rivers in Namibia's north-east and forming the borders (Orange River to South Africa, Kunene and Okavango to Angola, Zambezi to Zambia; Linyanti-Chobe to Botswana and Kwandu crossing from Angola/Zambia to Botswana). The country is rich in mineral resources, including diamonds and uranium. Other key economic pillars are agriculture, fisheries and tourism. Political stability and sound economic management have helped poverty reduction and allowed Namibia to become an upper-middle-income country. However, socioeconomic inequalities—the legacy of apartheid systems of government in the past—remain extremely high and were worsened by the COVID-19 pandemic. Structural constraints to growth have also hampered job creation.

Since its independence in 1990, Namibia had made progress in reducing poverty, halving the proportion of Namibians living below the national poverty line—to 28.7% in 2009-10 and to 17.4% by 2015-16. Despite this, deep underlying challenges persist: (1) Namibia ranks as one of the world's most unequal countries: Its Gini coefficient of 59.1 in 2015 was second only to South Africa. Geographical disparities in both economic opportunities and access to services are large and widening. High levels of inequality result in starkly different poverty rates across different groups, including by age and gender; (2) Relatively high poverty, lagging human capital, and poor access to basic services are interrelated problems: Namibia's poverty rapidly declined from 1993/94 to 2015/16, but it remains high for the country's level of development. Despite recent progress, Namibia ranked 117th among 157 countries on the Human Capital Index; (3) The duality of the labour (formal and informal market), combined with slow job creation and low primary-sector productivity, results in very high unemployment. In fact, Namibia ranked 125 out of 188 countries world-wide in the 2015 Human Development Index (HDI). Namibia's score on the HDI is better than the average for countries in sub-Saharan Africa but ranks below its neighbours Botswana and South Africa.

In terms of the Gender Development Index¹⁹ (GDI), Namibia ranks 0.986, thus nearly approximating a score of 1, which would signify perfect gender parity. When looking at the Gender Inequality Index²⁰ (GII), the situation in Namibia looks less favourable. Namibia's 2015 GII value is 0.474 and is ranked 108th out of 159 countries. In terms of the Global Gender Gap Index, Namibia is ranked at a whopping 14th rank out of 144 countries, indicating that on the indicators used women and men are scoring relatively equal, irrespective of the "level".

Community Conservancies are considered an important vehicle for advancing rural development, alleviating poverty, and building economic security for formerly disadvantaged Namibians.²¹ They contribute to Namibia's national economy while also unlocking significant revenue for local households and rural economies where other income streams are limited. For example, in 2019, the country's wildlife sector—including income from tourism and associated industries and joint ventures between Conservancies and private companies—contributed \$65M to the national economy. However, over the past several years, as COVID-19 negatively impacted the tourism and conservation sectors, it has become clear that communities need diversified income streams that are less dependent on tourism. Gender considerations remain important in the conservancy context (see the stand-alone Gender analysis and Action Plan, GAP), with women not yet adequately included in decision making, employment and benefit-sharing, amongst other.

¹⁹ The GDI measures difference in achievements between males and females in three areas: health (measured by female and male life expectancy at birth), education (measured by female and male expected years of schooling for children and female and males mean years of schooling for adults), and command over economic resources (measured by female and male estimated GNI per capita). This it essentially takes the HDI values and disaggregates them by sex. (African Human Development Report 2016)

²⁰ The GII measures gender-based inequalities in the areas of reproductive health (measured by maternal mortality ratio and adolescence birth rate), empowerment (measured by women's share of parliamentary seats and comparative attainment of at least secondary education) and economic activity (measured by labour market participation). For the GII a value of zero means better gender equality.

²¹ Like rangers in State Protected Areas, community members are employed as rangers who monitor wildlife, identify potential management risks, and combat poaching. They provide vital data collection, including on population trends and the number of HWC reported by community game guards. The regular game counts are important for quota setting for off-takes for local food as well as trophy hunting, which is tightly managed by MEFT under a permit system.

2.4 IPs and Vulnerable Groups

(a) Overview of Indigenous Peoples Situation

The Government of the Republic Namibia (GRN) does not recognise the term “indigenous peoples” as commonly defined in international law. As with a number of African states, GRN considers all “formerly disadvantaged” Namibians, i.e. those of non-European descent, to be indigenous and uses the term “marginalised communities” for groups that may be considered indigenous in international law. However, the term “marginalised communities” is in practice used to identify those Namibian groups with significant economic and social inequalities—namely, the San, Ovatie and Ovatjimba—and hence in need of focused government support, which makes the use of the term dissimilar from what “indigenous peoples” refers to in an international context. While “marginalised communities” is preferentially used by Government, the two terms are applied somewhat interchangeably in official documents.

Using GEF and UN guidelines, or the GRN-preferred context provided by the African Commission on Human and Peoples’ Rights (ACHPR)²², Namibia’s indigenous people include Namibia’s seven key San groups who were formerly hunter-gatherers—namely, the Hai|om, Khwe, !Xun, Ju|’hoansi, †Au|eisi, Naro and !Xóo.

Pastoralist groups, who may meet the criteria for identification as indigenous peoples in the international context, include the Ovatie (also known as Ovatwa), and may include the Ovatjimba, Ovahimba and Ovazemba. Some of these pastoralist groups are present in the Project implementation areas in the North West.

A Division of Marginalised Communities has been established and now resides under the Ministry of Gender Equality, Poverty Eradication and Social Welfare (MGEPESW). The Division provides support in terms of food and livelihoods support to Namibia’s marginalised communities. It is also spearheading the draft “White Paper on the Rights of Indigenous Peoples in Namibia”, which is awaiting Cabinet approval subject to additional consultations. An overview of existing legal frameworks, policies, and programmes, including both national and international law, the draft White Paper illustrates the core problems faced by the indigenous peoples, international recommendations, and national recommendations to address these problems.

The process for developing the White Paper on the Rights of Indigenous Peoples in Namibia was initiated by Namibia’s National Human Rights Institution, the Office of the Ombudsman, after a Universal Periodic Review (UPR) recommendation to Namibia. The Ombudsman has also published a “Guide to Indigenous Peoples’ Rights in Namibia” (2012).

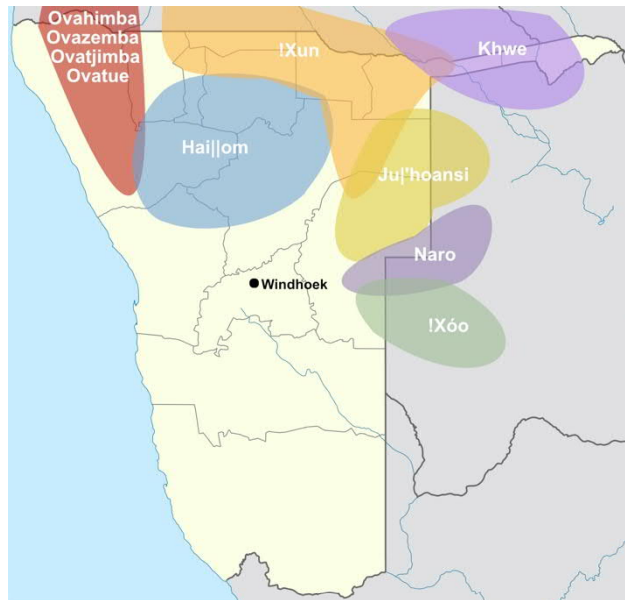


Figure 2: Map illustrating approximate locations of marginalized communities/indigenous peoples (UNDP, 2019) based on WIMSA (<http://www.san.org.za/>)

2.5. Gender

Namibia has made significant progress in promoting gender equality and women’s empowerment over the years. The government has implemented policies and programs aimed at addressing gender disparities in education, health, and economic participation.

²² African Commission on Human and Peoples’ Rights (ACHPR) and International Work Group for Indigenous Affairs (IWGIA) (2005)

In terms of education, the country has achieved gender parity in primary and secondary education enrolment, but there are still disparities in terms of academic achievement and dropout rates. In terms of health, maternal mortality rates have decreased, but women and girls still face challenges in accessing quality healthcare, particularly in rural areas. In terms of economic participation, women in Namibia are underrepresented in the formal labour market, and face wage disparities when compared to men. In terms of political representation, women's participation in politics is low and they are underrepresented in leadership positions.

Despite these challenges, Namibia has made some progress on women's rights. The country has ratified the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) and has a National Gender Policy in place which aims to promote gender equality and empower women. However, traditional and cultural practices still limit the rights and opportunities of women and girls in some communities. Overall, while there have been improvements, much work still needs to be done to fully achieve gender equality in Namibia. Efforts are needed to address persistent challenges, such as the underrepresentation of women in leadership positions and the wage gap, and to ensure that the rights and opportunities of women and girls are protected and advanced.

Table 2: Gender disaggregated key national development markers (Namibia Gender Analysis, LAC, 2017²³).

Area	825 234 square kilometres (km ²)	
Population (est 2015)	2.4 million female: 51% male: 49%	
Population density	2.6 people per km ² (2011)	
Rural/urban	urban 43%, rural 57% (2011)	
Race	87.5% black, 6% white, 6.5% mixed race	
Religion	predominantly Christian	
Official language	English	
Home language groups (2011)	Oshiwambo 49%, Nama/Damara 11%, Afrikaans 10%, Otjiherero 9%, Kavango 9%, Caprivian 5%, English 3%, Other 4%	
Marital status persons	age 15-49 (2013)	60% women never married 18% women married (civil or customary) 16% women living together informally with a partner 2% women divorced/separated 1% women widowed persons
	age 15+ (2011)	59% women never married 20% women married (civil marriage) 8% women married (customary marriage) 8% women living together informally with a partner 4% women widowed 2% women divorced/separated
Female-headed households (2011/2013)	44%	
Married couples in a household (2011)	under 8% of households reported the presence of a spouse of the head of household	
Life expectancy at birth (2015)	65.1 years (females: 67.5 years, males: 62.5 years)	
Fertility (2011)	3.6 children per woman	
Literacy (age 15 years and older, 2011)	89% overall (female: 88%, male: 89.5%)	
Unemployment (2016)	36% overall (female: 38%, male: 30%)	
Youth unemployment (2016)	43% overall (female: 49%, male 38%)	
Poor / severely poor	28.7% population poor, 15.3% severely poor overall (2009/10) female-headed households: 22% poor, 11% severely poor male-headed household: 18% poor, 9% severely poor 18% poor, 11% severely poor overall (2015/16) <i>sex-disaggregated figures not yet available</i>	
Gini coefficient	0.597 overall (female: 0.513, male: 0.622) (2009/10) 0.572 overall (sex-disaggregated figures not yet available) (2015/16)	
Access to a mobile phone or internet at home (2014)	91% overall (female: 90%, male: 92)	

The national gender disaggregated data shows that very high numbers of Namibian households are women led; few people are or have ever been married; comparing all markers, women fare worse than men.

²³ [Namibia Gender Analysis 2017 \(lac.org.na\)](http://Namibia Gender Analysis 2017 (lac.org.na))

Looking at Development and Gender Equity Indicators, Namibia ranked 125 out of 188 countries in 2015 on the Human Development Index (HDI). Namibia's score on the HDI is better than the average for countries in sub-Saharan Africa but ranks below its neighbours Botswana and South Africa. In terms of the Gender Development Index²⁴ (GDI), Namibia ranks 0.986, thus nearly approximating a score of 1, which would signify perfect gender parity. In terms of the Global Gender Gap Index, Namibia is ranked at 14th out of 144 countries, indicating that women and men score relatively equally on the indicators used. These rankings are in stark contrast to the Gender Inequality Index (GII) where Namibia's 2015 value is 0.474 and is ranked 108th out of 159 countries, which likely reflects poorer performance on other indicators.²⁵ The Social Institutions and Gender Index (SIGI) of the Organization of Economic Cooperation and Development (OECD) defines discriminatory social institutions as "the formal and informal laws, attitudes and practices that restrict women's rights and girl's access to rights, justice and empowerment opportunities. There are five sub-indices (1) discriminatory family code; (2) restricted physical integrity; (3) son bias; (4) restricted resources and assets; and (5) restricted civil liberties. In 2014, Namibia's SIGI value was 0.1173, with "restricted access to resources and assets" scoring extremely poorly. While not gender disaggregated, the Multi-dimensional Poverty Index (MPI) is significant because it identifies acute deprivations in the areas of health, education and standard of living. In Namibia (based on 2013 data), this index indicated that almost 45% of the population lives in multi-dimensional poverty, with an average deprivation score of 45.5%. An additional 19% of the population is vulnerable to poverty, while 13% live in severe poverty. According to the three dimensions of the index, deprivation in education accounts for 45%, followed by deprivation in living standards for 33% and deprivation in health for 22%. The regionally disaggregated data is of interest when considering Community Conservancies. Reviewing the African Gender Equality Index compiled by the African Development Bank, Namibia is ranked third best country after South Africa and Rwanda. The index measures economic opportunities, Human development and Law & Institutions. There are other gender indices and score cards available for Africa and SADC, with Namibia consistently ranking amongst the top performing countries.

Concerning Community Conservancies and the PFP, a detailed gender analysis has been undertaken based on a desk review and recent field consultations. The GEF project Gender Analysis and Action Plan (GAAP) for Namibia is annexed to the Prodoc.

3 Legislation and Institutional Frameworks for environmental and social matters

3.1 National Legislation, Policies and Regulations with regards to Environmental Protection and Conservation

Table 3: National Legislation, Policies and Regulations with regards to Environmental Protection and Conservation

National Priority (*National or regional policy, strategy, plan, reports, assessments under relevant conventions etc)	Description (of the way in which this project is in alignment with/will contribute to the national priority)
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²⁴ The GDI measures difference in achievements between males and females in three areas: health (measured by female and male life expectancy at birth), education (measured by female and male expected years of schooling for children and female and males mean years of schooling for adults), and command over economic resources (measured by female and male estimated GNI per capita). This it essentially takes the HDI values and disaggregates them by sex. (African Human Development Report 2016)

²⁵ The GII measures gender-based inequalities in the areas of reproductive health (measured by maternal mortality ratio and adolescence birth rate), empowerment (measured by women's share of parliamentary seats and comparative attainment of at least secondary education) and economic activity (measured by labour market participation). For the GII a value of zero means better gender equality.

<p>Article 95 of Namibia's Constitution</p>	<p>Description of policy: The policy framework for CBNRM stems from Namibia's constitution, Article 95 which stipulates that the State is required to ensure "the maintenance of ecosystems, essential ecological processes and biological diversity and the utilisation of living natural resources on a sustainable basis for the benefit of all Namibians, both present and future". The Government of the Republic of Namibia's Policy on CBNRM is therefore to have a CBNRM programme that recognises the rights and development needs of local communities, recognises the need to promote biodiversity conservation and empowers present and future generations to manage and benefit from wildlife, forestry, fisheries and other natural resources, in an integrated manner, that is also fully and recognized as a rural development option. These rights include rights to access, use, control and benefit.</p>
<p>Fifth National Development Plan (NDP5) (2017-2022)</p>	<p>Environment is one of four pillars of Namibia's national development plan. In line with the plan, the project will help to improve infrastructure, enforcement, combat poaching and illegal trade by enabling more resources to flow to CBNRM.</p>
<p>Harambee Prosperity Plan (2021-2025)</p>	<p>Action Plan of the Namibian Government Towards Economic Recovery and Inclusive Growth. The Economic Progression Pillar (one of five pillars of the overall plan) calls for Optimizing Stewardship of Natural Resources and enhancing productivity in key sectors by, inter alia, reviewing policy and legislation to unlock the economic potential of communal land.</p>
<p>National Biodiversity Strategy and Action Plan (NBSAP 2) (2013-2022)</p>	<p>By capitalizing an endowment fund that will provide financial support to enhance the effectiveness of community-based natural resource management and the expansion of the conservancy system in Namibia by making investments in (among other things): quota setting, hunting concessions, harvesting systems, human wildlife conflict mitigation, fire management, anti-poaching systems, game censuses and introductions, monitoring systems, law enforcement support, inter alia, the project will contribute directly to the achievement of a number of strategic goals set out in Namibia's NBSAP. These include: · Strategic Goal C: Improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity. The endowment established by the project will provide direct support to a number of strategic initiatives under Goal C, like: - Strategic Initiative 3.1.1 which aims to "ensure that all protected areas are managed using participatory and science-based site planning processes that incorporate clear biodiversity objectives, targets, management strategies and monitoring programmes"; -Strategic Initiative 3.1.2, which is focused on developing capacities and infrastructure within protected areas to attract tourism and tourism investment; and -3.1.3: which aims to Consolidate integrated park management to enable it to generate economic benefits, tackle human wildlife conflicts and contribute to biodiversity protection integrated into the wider landscape. · Strategic Goal E: Enhance implementation of NBSAP2 through participatory planning, knowledge management and capacity building, incl., mobilization of financial resources from all sources</p>
<p>The National Climate Change Strategy and Action Plan (2013- 2020) and Intended Nationally Determined Contributions document (2015) and updated NDC (2021)</p>	<p>The National Climate Change Strategy and Action plan set ambitious targets for climate change adaptation and mitigation, such as: 1. Reducing Greenhouse Gas Emissions by 89% by 2030; [...] 4. Reforesting 20,000 hectares annually from 2018; 5. Restoring 15 million hectares of grassland by 2030; 6. Practicing conservation agriculture on 80,000 hectares by 2030; 7. Implementing agro-forestry systems on 5,000 hectares of land commencing in 2018. Namibia's Updated NDC speaks specifically to the use of conservancies, community-based natural resource management (CBNRM) as a key adaptation approach.</p>
<p>National Policy on Community Based Natural Resource Management (2013)</p>	<p>Description of policy: The policy applies to communal land outside of protected areas and promotes the sustainable use of natural resources as well as the promotion of integrated natural resource planning and management including through formally registered Community Conservancies.</p>
<p>Nature Conservation Amendment Act, 1996 (Act 5 of 1996)</p>	<p>Description of policy: Provides the mechanisms for implementing the Conservancy Programme. It amends the Nature Conservation Ordinance, 1975 (Number 4 of 1975), by providing conditional rights to communities to manage game animals and to benefit from this management. It sets the formation of a conservancy as the condition upon which ownership over wild game and use rights over other game species will be given to communal area residents.</p>
<p>Forest Act, 2001 (Number 12 of 2001),</p>	<p>Description of policy: Community groups have the rights to proclaim Community Forests on their communal lands. Procedurally, the Minister may, with the consent of the Chief or Traditional Authority for an area which is part of communal land or such other authority which is authorised to grant rights over that communal land, enter into a written agreement with anybody who the Minister reasonably believes represents the interests of the persons who have rights over that communal land and is willing to and able to manage that communal land as community forest</p>

3.2 National Instruments and International Agreements and Treaties with regards to IPs

Indigenous Peoples national and international laws and institutions – Namibia

There are numerous government institutions, policies and laws that are relevant to Namibia’s indigenous peoples. Namibia has a progressive constitution and many national policies are inclusive in nature, even if this is not always reflected in implementation and decision-making. Namibia’s reporting on international conventions has improved in recent years, though, similarly, the implementation of resolutions and recommendations made under these agreements can be limited. Namibia is party to a number of treaties and processes relevant to indigenous peoples and local communities, and generally reports in a timely manner to treaty bodies.

Table 4: Indigenous Peoples national and international laws and institutions – Namibia

<p>The Constitution</p>	<p>Within the Constitution of Namibia, under <i>Chapter 3: Fundamental Human Rights and Freedoms</i>, there is a guarantee of equality and freedom from discrimination (10), rights to culture, language, tradition (Article 19) and the right to education (Article 20), deemed as compulsory until the age of 16, with Article 3 providing the right to use mediums of instruction other than English, to “ensure proficiency in the official language, or for pedagogic reasons”. Other areas of the Constitution specifically relevant to indigenous peoples in Namibia include: Article 15 – Children’s Rights; Article 17 - Political Activity; Article 23 - Apartheid and Affirmative Action. Additionally, Article 66 upholds the validity of customary and common law where this does not conflict with statutory law and the Constitution.</p> <p>Of particular interest in the Constitution is Article 144 – International Law, which states that: “Unless otherwise provided by this Constitution or Act of Parliament, the general rules of public international law and international agreements binding upon Namibia under this Constitution shall form part of the law of Namibia”.</p>
<p>Ministry of Gender Equality, Poverty Eradication and Social Welfare: Division of Disability Affairs and Marginalized Communities</p>	<p>The Division on Marginalized Communities advocates and promotes the rights issues of Marginalized Communities (San, Ovatie and Ovatjimba Communities) with focus on integrating and socio-economic mainstreaming in the society in line with National, Regional and International instruments that relate to the rights of Indigenous Peoples/Marginalized Communities. It is responsible for advocacy and promotion of human rights issues related to Marginalized Communities in line with International Conventions and Instruments and Protocols: United Nations Declarations on the Rights of Indigenous Peoples (UNDRIP), International Convention on the Elimination of All forms of Racial Discrimination (ICERD), Convention on the Elimination of All forms of Discrimination against Women (CEDAW). The DMC is responsible for the draft <i>White Paper on the Rights of Indigenous Peoples in Namibia, which</i>, after a series of consultations with government and communities, was adopted and later approved by the Office of Attorney General in 2019.</p> <p>It carries out a number of specific support programmes such as:</p> <p>Educational Support Programme: Render Education, Financial and Transport assistance to learners and Students. The programme aimed at providing financial, moral, and psychosocial support to learners and students emanating from the Marginalized Communities at all education levels, Early Childhood Development, primary, secondary, and tertiary education.</p> <p>Livelihood Support Programmes:</p> <ul style="list-style-type: none"> • <i>Special Feeding Programme</i> was initiated to provide healthy food supplements to the San people inclusive of the Ovatie and Ovatjimba communities considering their socio economic and impoverishment levels. It was introduced as the San Feeding Programme during the inception of the San Development Programme at the Office of the Prime Minister then. • <i>Burial Services</i> purpose is to provide funeral assistance to Marginalized Communities (San, Ovatie and Ovatjimba) to ensure that they are accorded a respectable and dignified burial.

	<ul style="list-style-type: none"> • <i>Livelihood Empowerment Projects</i> are initiated with the aim to empower, improve, supplement, and sustain the Marginalized Communities livelihoods through income generating projects and other activities. • Land Re-distribution: Access to Land and Housing Projects aim at facilitating the acquisition and redistribution of land to Marginalized Communities both in Commercial and Communal areas. It also aims to ensure that the Marginalized Communities are provided with and access to basic needs such as decent shelter, potable water and sanitation facilities in all the regions they reside.
Office of the Ombudsman	<p>Formed in 1990, the Office of the Ombudsman is Namibia's National Human Rights Institution (NHRI), with a mandate to investigate complaints against the Government and officials and those related to fundamental rights and freedoms, as well as to promote and protect human rights. The four areas of interest are defined as administration, human rights, corruption and the environment. Issues concerning the rights of indigenous peoples, as well as relevant aspects of international law, are a focus of the Ombuds Office. The Office of the Ombudsman has produced a <i>Guide to Indigenous Peoples' Rights in Namibia</i> (2012), which is a summary of national and international law relevant to indigenous peoples in Namibia and identifying key concerns: "<i>Indigenous Peoples (IPs) - Key concerns included the fact that many IPs do not have recognized traditional authorities (i.e. some San and Ovahimba), continued discrimination faced by IPs, challenges related to participation and consultation of IPs on national development issues as well as programme and projects that target their own development, challenges experienced with IPs to own, develop and control communal land (including conservancies), continued marginalization of IPs in terms of access to education (especially women and girls), absence of health facilities where IPs live or are resettled (esp. the San) and the fact that only few IPs practice their traditional way of life. Also of concern is the prevailing discrimination against indigenous populations, impacting their access to health care, income, education and basic services. The lack of representation of IP's in Parliament, LAs and RCs is also a concern.</i>"</p>
National Planning Commission (NPC)	<p>The Ministry of Economic Planning and National Planning Commission, under the Office of the President, is responsible for planning national priorities and national development through National Development Plans. The NPC developed a draft strategy entitled "<i>Mainstreaming Marginalised Communities in Namibia</i>" in September 2015.</p>
Ministry of Environment, Forestry and Tourism (MEFT)	<p>The MEFT is responsible for safeguarding Namibia's environmental resources and its mission is "to promote biodiversity conservation in the Namibian environment through the sustainable utilisation of natural resources and tourism development for the maximum social and economic benefit of its citizens." It works in a number of areas relevant to indigenous peoples. While not directed specifically at indigenous groups, the <i>Nature Conservation Amendment Act of 1996</i> sets out rights in terms of sustainable management and utilization of game within community conservancies. The Namibian conservancy programme has brought about considerable improvements in local rights and management of land and the natural resources it supports. In the case of the San, there are two majority San conservancies, Nyae Nyae and N!a Jaqna – managed by the Ju 'hoansi and !Kung respectively, which constitute a large part of the traditional lands of the San in Namibia. In spite of protections, threats from illegal grazing, poaching and unlawful land distribution remain a challenge.</p> <p>As the government ministry responsible for the management of national parks, MEFT is a key institution in cases where communities border on or live inside protected areas, as well the few cases of historical eviction of communities from protected areas in Namibia. Namibia's <i>Second National Biodiversity Strategy and Action Plan 2013-2022</i> (NBSAP) expresses the need for "biocultural protocols and practices of local communities documented according to mutually agreed terms", "systems in place to protect and document traditional knowledge as a basis for research and development of commercial biodiversity products" and the promotion of the "role of traditional knowledge, innovations and practices in the management and use of biodiversity".</p>

	The Forest Act 12 (2001) is not specific to indigenous peoples but confers rights upon communities to manage “community forests” and a range of resources, including grazing.
Ministry of Agriculture, Water and Land Reform (MAWLR)	The Communal Land Reform Act (2002) allows for the allocation of customary land rights to communities for farming and residential units (and “any other form of customary tenure that may be recognised and described by the Minister”), with decision-making powers vested in communal land boards on which the community should be represented, and with the agreement of the Traditional Authority in the area. It does not, however, confer communal land rights in terms of customary practice, hence the group tenure systems practiced by the San and other groups are not well represented. The National Resettlement Policy (2001) identifies the San as one of the principal group who should benefit from the resettlement process, and that the “San Community have endured exploitation and discrimination at the hands of their fellow citizens throughout history...are marginalized and subjected to unfair labour practices and inadequate shelter”.
Ministry of Education, Arts and Culture (MoEAC)	Namibia has a progressive policy regarding aspects of inclusive education, especially language, and now provides both free primary and secondary education. However, the Government acknowledges that limited gains have been made with marginalised communities, due to a variety of socioeconomic factors, elements of discrimination, and a lack of capacity in terms of teaching staff. The following policies are particularly relevant to indigenous peoples: <i>Language Policy for Schools in Namibia</i> (1991 and revised 2003), <i>2002 Education-For-All (EFA) National Plan of Action 2002-2015</i> , <i>National Policy Options for Educationally Marginalised Children</i> (2000), <i>Sector Policy on Inclusive Education</i> (2013), and the <i>Education Sector Policy for Orphans and Vulnerable Children</i> (August 2008).
United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)	Namibia was initially part of the African contingent opposing aspects of the UNDRIP, but did become a signatory to the Declaration in 2007. The DMC is responsible for this Declaration.
Permanent Forum on Indigenous Issues (PFII)	Namibia has attended most sessions of the PFII since 2007 and reports briefly to it on the DMC programme achievements. It is notable that San representation from civil society has been poor in recent years. A San staff member of the DMC has been a member of the Permanent Forum (2020-2022) as an African representative.
United Nations Special Rapporteur on the rights of indigenous peoples	The Special Rapporteur on the rights of indigenous peoples (then James Anaya) was invited to Namibia in 2012. The resulting report, <i>The Situation of Indigenous Peoples in Namibia</i> (2013), provides a comprehensive overview of indigenous peoples’ issues in the country, and specific recommendations for Government and other stakeholders.
African Charter on Human and Peoples' Rights (ACHPR)	The African Commission on Human and Peoples' Rights Working Group on the Rights of Indigenous Populations/Communities conducted an assessment of Namibia in 2005, with the support of International Working Group of Indigenous Affairs (IWGIA). While the assessment is now outdated, the report makes a range of recommendations for education, leadership, health, poverty, land and stigmatization.
Universal Periodic Review (UPR)	The UPR process has provided substantive inputs to the Government with regard to Namibia’s indigenous peoples, including in relation to human rights and policies.
International Convention on the Elimination of All Forms of Racial Discrimination (ICERD)	The concluding observations in Namibia’s the thirteenth to fifteenth periodic reports under this Convention (2016) made a number of strong recommendations regarding indigenous peoples. These include: monitor the impact of measures taken to improve realization of rights for indigenous peoples; implement a range of recommendations made by the Special Rapporteur on the rights of indigenous peoples; give particular importance to recommendations on education and land, and disaggregated data for ethnic groups on the enjoyment of social and economic rights. No update date report was due to date.

International Covenant on Economic, Social and Cultural Rights (ICESCR)	Under this Covenant, the 2016 concluding observations by the CESCR Committee on the initial report of Namibia includes a section on the rights of indigenous peoples. It recommends that Namibia adopt legislation that recognizes indigenous peoples, including land tenure, livelihoods and FPIC, and ILO 169. It goes on to specifically mention FPIC in light of the Baynes dam project, which affects Ovahimba, Ovatjimba, Ovazemba and Ovatue communities and recommendations of the Special Rapporteur's report.
International Covenant on Civil and Political Rights (ICCPR)	The concluding observations of the Human Rights Committee on the second report of Namibia (2016) highlighted the continuing discrimination against indigenous peoples, with recommendations aimed at the broad reduction of discrimination in Namibian society. In terms of the rights of minorities, the committee recommends that Namibia ensures that indigenous peoples have "titles over lands and territories that they traditionally occupied or resources they owned". The recommendation also refers to free, prior and informed consent (FPIC) ²⁶ practices, especially in regard to extractive industries, which gives indigenous peoples the right give or withhold consent to a project that may affect them or their territories.
Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW)	No specific recommendations were given regarding indigenous women in the last session of 2015, though questions were raised concerning San women's access to health care, employment, education and agricultural land.
Convention on Biological Diversity (CBD)	Namibia submits periodic national reports to the CBD. With relevance to indigenous peoples, articles of the Convention cover the protection of traditional cultural practices that are compatible with conservation and sustainable use, traditional knowledge and genetic resources. Little reference in Namibia's report is given to indigenous peoples, with the exception of developing a "Bill on Access to Genetic Resources and Associated Traditional Knowledge in 2011" where the consultative process incorporated "indigenous and local communities". The MEFT NBSAP plans also fall under the CBD.
United Nations Sustainable Development Goals (SDGs):	Namibia is an active partner with local and global UN offices regarding the 2030 Agenda for the Sustainable Development, and the Sustainable Development Goals (SDGs) to eliminate poverty, diminish inequalities and injustices and reduce climate change. Country-specific targets have not yet been defined.

3.3 National Instruments and International Agreements and Treaties with regards to Gender

Table 5: National Instruments and International Agreements and Treaties with regards to Gender

Legal Frameworks and Policies	Provisions for gender equality and women empowerment
National Gender Policy (2010-2020)	The overriding national policy instrument that requires all sectors to mainstream gender, promote women empowerment and overall bring about gender equality. The National Gender Policy and the overall function of ensuring and coordinating gender equality are under the custodianship of the Ministry of Gender Equality and Child Welfare (MGE CW).

²⁶ Free: consent given voluntarily and without coercion, intimidation or manipulation. A process that is self-directed by the community from whom consent is being sought, unencumbered by coercion, expectations or timelines that are externally imposed; Prior: consent is sought sufficiently in advance of any authorization or commencement of activities; Informed: nature of the engagement and type of information that should be provided prior to seeking consent and also as part of the ongoing consent process; Consent: collective decision made by the right holders and reached through a customary decision-making processes of the communities.

<http://www.fao.org/indigenous-peoples/our-pillars/fpic/en/>

Married Persons Equality Act, 1996 (Act No. 1 of 1996)	Eliminated the discriminatory Roman-Dutch concept of marital power applicable to civil marriage.
Co-operatives Act, 1996 (Act No. 23 of 1996)	Guarantees that membership must be irrespective of gender and other social status.
Affirmative Action (Employment) Act, 1998 (Act No. 29 of 1998)	<p>Promulgated to ensure that persons in designated groups enjoy equal employment opportunities at all levels of employment and are equitably represented in the workforce of a relevant employer". Women are amongst the designated social groups targeted by the Affirmative Action Act, 1996.</p> <p>It should also be noted that the Labour Act 11 of 2007 and Child Care and Protection Act 3 of 2015 provide protections for children to ILO international standards. Children under age 14 are prohibited from being employed, and there are different sets of rules for children aged 14-16, and for children aged 16-18 regulating employment types, and parental consent is needed for children to take part in a range of public activities.</p>
Traditional Authorities Act, 2002 (Act no. 25 of 2000)	Provides to promote gender equality with regards to positions of leadership.
Communal Land Reform Act, 2002 (Act No 5 of 2002)	Provides for equal access to land for men and women, and importantly that safeguard the rights of widows to remain on the land after the passing of their spouses. Through the provisions of the Communal Land Reform Act, 2002 the government has established Communal Land Boards guaranteeing a quota of women for boards' membership. This provision is also provided for in the National Land Policy of 1998.
Regional (SADC and Africa level) and International Agreements	
Regional (SADC and Africa level)	SADC Declaration on Gender and Development
	SADC Protocol on Gender and Development
	Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa (2003)
International level	Beijing Declaration and Platform for Action
	Convention on the Elimination of All Forms of Discrimination Against Women
	Millennium Development Goals (ended in 2015)
	Sustainable Development Goals
	Convention on the Rights of the Child (1990)
	UN Convention against Transnational Crime, 2000
	Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children, known as the Palermo Protocol
	UN Security Council Resolution 1325 on Women, Peace and Security (2000)
	International Conference on Population and Development (1994)
	Universal Declaration on Human Rights
	International Covenant on Civil and Political Rights
	International Covenant on Economic, Social and Cultural Rights
The International Labour Organization's Convention No. 183	

3.4 WWF Safeguards Standards and Procedures Applicable to the Project

This ESMF has been prepared in line with WWF's [Environment and Social Safeguards: Integrated Policies and Procedures](#) (ESSF), which came into effect August 2019. Through these, WWF meets the requirements of the GEF's Environmental and Social Safeguards Policy.

WWF's Existing Social Policy Framework

WWF is a founding member and one of the first signatories of the 2009 Conservation Initiative on Human Rights, committing itself to respecting internationally recognized human rights and ensuring that WWF projects do not result in human rights violations.

Through this mechanism, WWF commits to these principles:

Respect Human Rights. Respect internationally proclaimed human rights and make sure that we do not contribute to infringements of human rights while pursuing our mission.

Promote Human Rights Within Conservation Programs. Support and promote the protection and realization of human rights within the scope of our conservation projects.

Protect the Vulnerable. Make special efforts to avoid harm to those who are vulnerable to infringements of their rights, and to support the protection and fulfilment of their rights within the scope of our conservation projects.

Encourage Good Governance. Support the improvement of governance systems that can secure the rights of indigenous peoples and local communities in the context of our work on conservation and sustainable natural resource use, including elements such as legal, policy, and institutional frameworks, and procedures for equitable participation and accountability.

Complementing this commitment to human rights, WWF has further adopted the following social policies.

The WWF Statement of Principles on Indigenous Peoples and Conservation (1996 and updated in 2008). These principles ensure that the rights of indigenous peoples are respected in WWF's work, that indigenous peoples do not suffer adverse impacts from WWF projects, and that they receive culturally appropriate benefits from conservation. WWF must ensure the following:

- Projects respect indigenous peoples' rights, including to free, prior, and informed consent and to tenure over traditional territories.
- Culturally appropriate and equitable benefits (including from traditional ecological knowledge) are negotiated and agreed upon with the indigenous peoples' communities in question.
- Potential adverse impacts are avoided or adequately addressed through a participatory and consultative approach.

The WWF Policy on Poverty and Conservation (2009) reaffirms WWF's commitment to embrace a pro-poor approach to conservation, strive to find equitable solutions for people and the environment, and make special efforts to enable local people to play a key part in crafting solutions for sustainable development.

The WWF Gender Policy (2011) signifies WWF's ongoing commitment to equity and integrating a gender perspective in its policies, programs, and projects, as well as in its own institutional structure.

WWF's safeguards standards require that any potentially adverse environmental and social impacts are identified and avoided or mitigated. The overall safeguards policies of WWF are indicated below and those relevant to this project are marked as triggered. The details of the safeguards issues in Namibia are described in some detail under each section. The WWF ESS screening tool was used to identify potential social and environmental risks in the area of influence and work of WWF Namibia, including and covering those associated with this. The screening addressed issues such as mainstreaming human rights, gender equality and women's empowerment, and environmental sustainability.

Based on the screening tool, a WWF ESS Risk Categorization Memorandum was issued, classifying Namibia as a medium risk landscape. Four substantive safeguard standards have been triggered by this project, on (1) Natural Habitats, (2) Indigenous Peoples, (3) Community Health, Safety and Security, and (4) Pest Management. Further four process standards apply, namely: the Environmental and Social Management Framework (ESMF), Consultation and Disclosure, Community Stakeholder Engagement and Grievance Mechanism. It is noted that the Extension services to be covered by the Endowment investments will be clearly in line with the ongoing activities of WWF in the landscape.

It is reiterated that, given that the nature and extent of the activities that will be funded by the Endowment Fund in the future are still being defined, this analysis is to be seen as a preemptive listing of potential impacts, which will be considered once fund distribution will commence, approximately from 2030 onwards. The list of eligible activities to be supported by this Fund will be finalized by December 2024, at the time of the project's "single close" (refer to ProDoc for more details on Operations Manuals).

As this ESMF explains (see Chapter 7, Implementation Arrangements), in advance of the assignment of a Grant to a Conservancy or service provider from the Endowment Fund (or other financing available to this project for the purpose of enabling extension services), the Safeguards Specialist at the Fund Manager/Conservation Trust Fund (CTF)²⁷ should fill in detailed information regarding the nature of the activity and its specific location in the *Safeguards Eligibility and Impacts Screening Form* (Annex IV). The results of that screening will indicate whether the development of any management plans (such as ESMPs, IPPs, pest or cultural heritage, among others) is necessary.

The GEF-capitalized Endowment Fund has an approximate maturation period of five years and only after that timeframe will the actual payouts for the critical support services commence. However, given that GEF standards apply to the entirety of this project—namely, to all the funding in this PFP and not just to the GEF-supported Endowment Fund—in the event that those critical support services begin implementation via other funds available to this project prior to the availability of the GEF funding, the provisions in this document will become effective at that time.

3.4.1 Safeguards Standards Triggered by this project

(i) Standard on Environment and Social Risk Management (triggered in Namibia)

This standard is applicable because it is a process standard that applies to all medium and high-risk landscapes in which WWF operates and Namibia has been classified as "medium risk." The precise location and potential impact of specific activities cannot be determined at this stage and will only be known during project implementation²⁸, which will take place only from 2030 onwards, when the Endowment has matured and disbursements can be made. 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.

²⁷ Please note that, in this document, Fund Manager, Fund Administrator and CTF are used interchangeably.

²⁸ The closing of the PFP deal is foreseen for December 2024. In line with the closing conditions, the Endowment fund will then have to mature for an agreed to period, currently proposed to be 5 years. Only after this maturation period payments from the Endowment are allowed.

(ii) Standard on Protection of Natural Habitats (triggered in Namibia)

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.

At this point, there are no planned activities that would negatively impact natural habitats. However, this standard has been triggered as a precaution because some of the extension services to be supported through the Endowment Fund might entail on-the-ground activities, including implementation of climate-adaptive strategies such as solar panels, development of vegetable gardens and gazettement work, among others. Consequently, further environmental impact assessments will be needed as the specific activities and locations become better defined to determine which safeguard measures, if any, need to be in place to ensure no lasting damage to natural habitats or the people that rely on them occur.

(iii) Standard on Restriction of Access and Resettlement (not triggered in Namibia)

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 has not been triggered in Namibia.

That notwithstanding, it is likely that this project will entail gazettement work to establish new conservancy boundaries as well as other zonation and integrated land use works, which might derive in boundary disputes. As such, this has been noted as a social risk and is presented in Chapter 4 of this ESMF. Furthermore, guidance on the development of Livelihood Restoration Plans has been included in Annex V.

(iv) Standard on Indigenous Peoples (triggered in Namibia)

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.

The Indigenous Peoples Standard has been triggered due to the presence of San and Himba peoples in the Namibian landscape. These groups are considered as Indigenous Peoples under WWF's Indigenous People's Policy and safeguards standard and are present in some of the Conservancies being supported by WWF Namibia. Due to their presence, WWF requires additional consideration and support for their rights consistent with both WWF's policies and the recognition afforded to them by the Government of Namibia. The primary approach to avoiding negative impacts on Indigenous Peoples has been the inclusive community mobilization process of Conservancy establishment and governance, including the development of Equitable Benefit Sharing Plans. The main positive impacts for Indigenous Peoples are the consolidation of communal rights to wildlife and other resources and access to benefits from their sustainable use, such as meat and income from traditional and commercial harvests and high-end tourism. Potential risks include inequitable benefit-sharing and lack of inclusivity in decision-making bodies where these groups are a minority or unrepresented. This situation could potentially affect the livelihoods or culture of San community members. At least one such case exists amongst the 86 Conservancies, and that Conservancy has agreed to amend its Constitution to assure San representation in the decision-making body.

(v) Standard on Community Health, Safety and Security (triggered in Namibia)

This Standard ensures that the health, safety and security of communities are respected and appropriately protected. The Guidance on Labour 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 labour 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.

The Community Health, Safety and Security standard is triggered because the potential for Human Wildlife Conflict (HWC) exists where communities are living in proximity to wildlife, including in the CBNRM approach which empowers communities to manage and benefit from wildlife. The CBNRM program does an excellent job in incorporating strategies to mitigate such risks and ongoing attention to HWC should remain central to programmatic efforts. Second, in 2014, WWF Namibia expanded its programming to include a wildlife crime program to combat illegal poaching of rhino, elephant, and later pangolin. WWF Namibia supports the Government of Namibia's Blue Rhino Taskforce (BRRT) (comprised of selected members from the Ministry of Environment, Forestry and Tourism (MEFT), and the Namibian Police's Protected Resources Division (NAMPOL)) through the non-government organization, the Rooikat Trust. This support is focused on administrative support, capacity building and mentoring, and operational support like equipment (no arms), technical assistance and partnership brokering, including integration with the CBNRM program. While the human rights and governance context in Namibia is strong, there are inherent risks in wildlife crime control such as potential retribution against community members engaging with law enforcement officers when they discover poaching on their lands and or potential for WWF's material support to be used in abusive activities by individuals.

(vi) Standard on Pest Management (triggered in Namibia)

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.

While the project will not procure any pesticides, it might promote the use of registered biopesticides as part of the extension service that seeks to support conservation agriculture. Because this entails the introduction of smart farming methods and training on practices that allow for less pesticide use, this standard has been triggered out of an abundance of caution.

(vii) Standard on Cultural Resources (not triggered in Namibia)

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 has not been triggered in Namibia.

(viii) Standard on Grievance Mechanisms (triggered in Namibia)

Project-affected communities and other interested stakeholders may raise a grievance at any time to the project implementing agency (PIA) (Conservation Fund Manager) or PMU and WWF. The PIA/PMU will be responsible for informing project-affected parties about the Accountability and Grievance Mechanism. Contact information of the PIA/PMU and WWF will be made publicly available. Relevant details are also provided in the Grievance Redress section of this document, displaying the existing grievance mechanism of WWF Namibia.

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-centred

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.

This standard is applicable because it is a process standard that applies to all medium and high-risk landscapes in which WWF operates.

(ix) Standard on Public Consultation and Disclosure (triggered in Namibia)

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.

This standard is applicable because it is a process standard that applies to all medium and high-risk landscapes in which WWF operates.

(x) Standard on Stakeholder Engagement (triggered in Namibia)

This standard ensures that WWF is committed to meaningful, effective and informed stakeholder engagement in the design and implementation of all GEF 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 updated and finalized before disbursements from the Endowment, currently foreseen for 2030.

This standard is applicable because it is a process standard that applies to all medium and high-risk landscapes in which WWF operates.

Furthermore, WWF has issues guidance on relevant human right issues, which are embraced by WWF Namibia. They are as follows:

(xi) 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 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, labour 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.

(xii) Guidance Note on Labour 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, especially the 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. Namibia is aligned with the majority of the ILO's fundamental and governance conventions, which is reflected in the Labour Act 11 of 2007.

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

(xiii) Guidance Note on Projects Relating to Dams (not triggered in Namibia)

In many river basins, WWF's freshwater conservation work is affected by the development of new dams or by the operations of existing dams. WWF is opposed to unsustainable dams that do not adhere to internationally recognized principles and criteria for good practice. WWF advocates that (1) no dams be built in, or affect, areas of high conservation value; (2) alternatives be fully considered before decisions are made to build new dams; and (3) principles, tools, and inclusive, transparent processes be applied that make the best possible choices regarding the management of existing dams and development of new dams.

WWF actively works to assess existing dams to minimize impacts and maximize benefits and to reduce the demand for new dams. WWF advocates for improvement of operational management for environmental benefits at existing dams, through related policies, plans, or regulations. This can include:

- Establishing environmental flow regimes to restore ecological functions downstream of a dam by mimicking natural variability in river flows. Work may include assessment of environmental flow requirements, hydrological studies, design of reservoir releases, and policy work;

- Promoting retrofitting dams or infrastructure to improve performance and reduce need for new infrastructure;
- Promoting adaptation of existing infrastructure to allow for improved environmental performance; and
- Promoting decommissioning or removal of hazardous or obsolete dams.

Dam Safety

Given the above instances, and in line with WWF Network’s position on dams, WWF can:

- For GEF and GCF projects, partner with a GEF and GCF Implementing Agency that is accredited for Safety of Dams safeguards to jointly support such efforts, so long as the other agency’s safeguards system is applied for the entire project;
- Implement projects that involve working with the government or relevant sector on strategic river basin planning, with the goal of restricting or concentrating dams to appropriate rivers and watersheds of lower conservation value (e.g., already altered);
- Implement projects that result in recommendations for environmental flow requirements for a stream or river (e.g., timing, volume, duration);
- Implement projects that involve working with governments to ensure better regulation of hydropower sector;
- Implement projects that build capacity in the hydropower sector and government ministries to improve environmental-based approaches/tools for sustainable development; and
- Implement small or minor water infrastructure work whose impact is deemed not to trigger Safety of Dams safeguards through WWF’s Policy on Environment and Social Risk Management

(xiv) Guidance Note on Ranger Principles

Rangers play a key role in protecting wildlife, managing protected areas, and resolving human-wildlife conflict. In the Namibian context community rangers are employed by the local Community conservancies. Such rangers/ game guards 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. 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.

It is noted that in Namibia community rangers, by law, are not carrying weapons.

3.5 Gaps between the Republic of Namibia laws and policies and the WWF’s SIPP

In general, Namibia’s laws, policies and guidelines are in line with WWF’s ESS requirements. Some differences between them may occur (see overview in Table 6).

Table 6: Overview of potential gaps between country policies and laws and WWF SIPP

Standard triggered in Namibia	Potential gaps between country policies and laws and WWF SIPP
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Standard on Environment and Social Risk Management (triggered in Namibia)	<ul style="list-style-type: none"> • The Namibian law does not require ESSFs in particular, however provides an overall legal framework of operation. WWF Namibia operates under a MOU with the Government of Namibia and adheres to the national laws. • While currently no specific risks have been identified, WWF requires an analysis of the impact of specific project activities on the environment and local communities before the endowment funds are disbursed. This is in addition to the national legal requirements. • The 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 during the Endowment Fund disbursement by the fund manager. • The project needs to adhere with the international standard and guidance if they are more stringent than the national laws.
Standard on Indigenous Peoples (triggered in Namibia)	<ul style="list-style-type: none"> • Due to the presence of IPs, WWF requires additional consideration and support for their rights consistent with both WWF's policies and the recognition afforded to them by the Government of Namibia. • The definition/ status of IPs in the Namibian legislation differs, and WWF Standard Implementation Plans & Procedures (SIPPs) apply.
Standard on Community Health, Safety and Security (triggered in Namibia)	<ul style="list-style-type: none"> • Specific risk areas around Human-Wildlife Conflict and wildlife crime control for which WWF SIPPs may offer specific context, e.g. while the human rights and governance context in Namibia is strong, there are inherent risks in wildlife crime control such as potential retribution against community members engaging with law enforcement officers when they discover poaching on their lands and or potential for WWF's material support to be used in abusive activities by individuals • SEAH risks follow WWF's international best practices and standards; these may be more explicit than enshrined in Namibia's laws
Standard on Grievance Mechanisms (triggered in Namibia)	<ul style="list-style-type: none"> • In addition to country-level dispute resolution and redress mechanisms • Focuses on potential specific breaches of WWF's policies and procedures
Standard on Public Consultation and Disclosure (triggered in Namibia)	<ul style="list-style-type: none"> • Specific WWF standards & SIPPs, not addressed and required in the Namibian legal context
Standard on Stakeholder Engagement (triggered in Namibia)	<ul style="list-style-type: none"> • Specific WWF standards and SIPPs, not addressed and required in the Namibian legal context

For the purposes of the “Enduring Earth: Accelerating Sustainable Finance Solutions to Achieve Durable Conservation” (WWF ID: G0038; GEF ID), the provisions of the WWF's ESSF and IPPF shall prevail over the Republic of Namibia's legislation in all cases of discrepancy.

4. Anticipated Environmental and Social Impacts and Mitigation Measures

This section outlines potential adverse environmental and social impacts that may result from project activities.

As already mentioned, not all potential impacts of this project are known at this stage because the scope and nature of the activities to be supported by the GEF-capitalized Endowment Fund are still being defined. However, given what is presently known, this ESMF contains an Indigenous Peoples Planning Framework (IPPF), which indicates the process that should be followed to develop site- and activity specific Indigenous Peoples Plans (IPPs); lays out the process for establishing future ESMPs as needed; and contains a succinct Pest Management Plan.

As will be detailed later in this document, in advance of the assignment of a Grant to a Support organization/service provider or directly to a Conservancy, the Safeguards Specialist at the CTF should fill in detailed information regarding the nature of the activity and its specific location in the *Safeguards Eligibility and Impacts Screening* form (Annex IV). On this regard, please note the following:

- All plans developed during the GEF project implementation and beyond should be compliant with the procedures and the standards set up in this ESMF.
- Any service provider who receives funding to support any of the conservancies must follow the guidance contained in this ESMF; language reflecting this understanding must be included in any agreements with any provider/third party.

It is noted that the “extension services” to be supported from the Endowment are currently well within the ambit of the WWF ESSF. Namibia’s ESSF risk screening took place over a consultative period between 2019 and 2021 and the Namibia Risk Categorization Memorandum (Cat Memo)—which categorized the Namibia landscape as “medium” risk—was issued in November 2021. The ESSF contains guidance on measures and plans to avoid negative impacts, and where avoidance is not possible, to reduce, mitigate and/or offset adverse risks and impacts.

4.1 Adverse Environmental Impacts

The project funding will be used for delivering the PFP Conservation Plan. The negative environmental impacts associated with this undertaking are considered to be minimal. On the contrary, not investing into the Endowment Fund would constitute a risk to the sustainability of the Community Conservancy system and thus potentially threaten conservation gains attained over the past 25 years. The long-term sustainable funding mechanism is designed to support local community conservancies to reach and maintain compliance and to invest into conservation management.

Certain environmental impacts to be considered:

- The community conservancies are legally established entities with specific conservation management requirements. Annually conducted game counts (conservancies, with MEFT and NACSO partners) provide the foundation for setting wildlife utilization quotas both for trophy hunting and subsistence use. The hunting quotas and right to utilize wildlife are the major drive behind the conservation model and have paid out in the last decades. However, there is a need to ensure that quotas remain sustainable and do not negatively impact overall wildlife populations, especially during years of prolonged drought when wildlife numbers naturally fluctuate.
- Hunting operators are important partners in the conservancy model and need to be screened carefully. The NACSO partners support MEFT and the Conservancies in contract selection and management, i.e. legal advice, as needed.
- Wildlife reintroductions are a key management intervention. All wildlife introductions need to follow national conservation best practice and need to be undertaken after relevant feasibility studies and assessments have been undertaken. Animal health considerations also need to be taken into account. Only indigenous species are being introduced into areas with suitable habitat.
- Fire management is an important part of savanna ecosystem health and management. However, fire regimes need to be carefully managed including for potential health risks.
- Potential livelihoods support interventions can have adverse environmental impacts. Livestock management, conservation agriculture, water point management are all issues that need to be carefully considered in the context of the habitat and natural resources in an area. Human development aspirations are not always directly compatible with wildlife management goals and human-wildlife conflict needs to be carefully addressed. Maladaptive investments (e.g. availing water sources in highly dynamic drylands systems) can aggravate living conditions and lead to livestock losses and increased HWC in drought situations.
- Tourism numbers and developments need to undergo environmental impact assessments (EIAs) to ensure that they are not posing environmental threats to Conservancies.

4.2 Environmental Mitigation Measures

Table 7: Anticipated Environmental Impacts and Mitigation Measures

Project Activity	Potential impact	Proposed mitigation measures	Responsible party
Component 1: Deploying Project Finance for Permanence (PFP) for priority conservation areas in Namibia			
<p>Payment for extension services from Endowment Disbursements: Natural Resource Management and Monitoring</p> <p><i>Mapping, gazettment, management plans, quota setting, hunting concessions, harvesting systems, human wildlife conflict mitigation, fire management, anti-poaching systems, game censuses and introductions, monitoring systems, law enforcement support, etc.</i></p>	<ul style="list-style-type: none"> • Wildlife overutilisation (quota setting) • Overharvesting (quota setting) of natural resources • Wildlife introductions can have adverse impacts on existing fauna and flora • Fire management adverse impact on habitat (wrong/ inappropriate fire regimes) • Unethical hunting practices 	<ul style="list-style-type: none"> • Apply best state of the art scientific knowledge from target areas and species • Work closely with MEFT (authority setting quotas) to ensure sustainable off take and harvest; work with permitting offices • Undertake relevant feasibility studies for wildlife re-introductions; e.g., no introductions of alien species • Conduct extensive due diligence on operators who receive hunting concession contracts. • Manage HWC – remove problem animals 	<p>CTF (including but not limited to Safeguards Specialist)</p> <p>MEFT</p> <p>Extension service providers</p> <p>Conservancies</p> <p>WWF Namibia</p>
<p>Payment for extension services from Endowment Disbursements: Institutional Development and Governance</p> <p><i>Legal and policy support, conservancy establishment, stakeholder engagement, conflict resolution, learning exchanges, and training on constitution implementation and amendments, Annual General Meetings, financial management and reporting, advocacy, etc.</i></p>	No adverse impacts envisaged	No adverse impacts envisaged	<p>MEFT</p> <p>Extension service providers</p> <p>Conservancies</p> <p>WWF Namibia</p>
<p>Payment for extension services from Endowment Disbursements: Business, Enterprise, & Livelihood Services</p> <p><i>Tourism planning, business planning and feasibility assessments, marketing,</i></p>	<ul style="list-style-type: none"> • Conservation incompatible business, enterprise or livelihood developments (e.g., unsustainable livestock or agricultural developments impeding on wildlife areas and potentially aggravating HWC) 	<ul style="list-style-type: none"> • Undertake relevant feasibility studies, sustainability screenings and obligatory EIAs as applicable • The project will not fund nor include the promotion or usage of pesticides, but it will assess 	<p>CTF (including but not limited to Safeguards Specialist)</p> <p>MEFT</p>

<p><i>environmental assessments, tax assistance, contracts, insurance, product development, training on: finance and administration, communications, negotiations, infrastructure maintenance, etc.</i></p>	<ul style="list-style-type: none"> • Conservation agriculture will promote the application of eco-friendly agricultural practices, which might entail the promotion of environmentally friendly pest management systems and fertilizers. This may cause pollution of soil and water, affecting local biodiversity and people. • Unsustainable tourism development in sensitive areas; over overutilization of water, poor waste and sanitation management • Adverse infrastructure developments 	<p>appropriateness of pesticides and fertilizers in the local context. It will also build the capacity of executing partners to ensure full awareness and knowledge regarding the usage and impacts of selected pesticides and fertilizers.</p> <ul style="list-style-type: none"> • Develop SOPPs for trade-off investments (such as mixed livestock and wildlife management systems) 	<p>Extension service providers Conservancies WWF Namibia</p>
<p>Component 2: NOT APPLICABLE TO NAMIBIA</p>			
<p>Component 3: M&E and KM</p>			
<p>M&E</p>	<p>No adverse impacts expected</p>	<p>No adverse impacts expected</p>	<p>WWF</p>

4.3 Adverse Social Impacts

Similarly to the anticipated environmental impacts of the intervention, the social impacts are considered to be positive overall. The long-term sustainable funding mechanism is designed to support local community conservancies to reach and maintain compliance and to invest into livelihood improvements whilst generating conservation benefits.

As outlined above, Namibia implements outcome 1 and 3 of project Component 1 as well as Component 3 on M&E and knowledge management. The GEF funding is primarily earmarked for the Endowment Fund that will be set up under the PFP.

Certain social impacts need to be considered:

- The community conservancies are legally established entities with standardised governance systems, rules and regulations in place. Community conservancy committees are elected. They act within the ambit of the national laws. This is a democratic system, functioning on a majority principle for decision making and may not include the views of every single community member.
- Existing community power relations may be affected by accessing funding for community conservancies, including with formal Traditional Authorities, part of the Namibian governance system. National laws and human rights will be observed in all activities supported by the funding mechanism.
- Indigenous peoples and vulnerable groups might not engage in or benefit from project activities due to discrimination or other forms of lack of inclusion.
- The project might not fully incorporate the views of women and girls, and therefore not provide equitable opportunities.
- Localised disagreements do occur between land and resource management and utilisation plans of Conservancies and other land users, including illegal grazing and fencing. The project may exacerbate such issues through strengthening Conservancy administration and patrolling.
- Increased wildlife numbers may result from strengthening Conservancies and may be accompanied by increased Human-Wildlife Conflict and Wildlife Crime

4.4 Social Mitigation Measures

Table 8: Anticipated Social Impacts and Mitigation Measures

Project Activity	Potential impact	Proposed mitigation measures	Responsible party
<i>Component 1</i>			
<p>Payment for extension services from Endowment Disbursements: Natural Resource Management and Monitoring</p> <p><i>Mapping, gazettement, management plans, quota setting, hunting concessions, harvesting systems, human wildlife conflict mitigation, fire management, anti-poaching systems, game censuses and introductions, monitoring systems, law enforcement support, etc.</i></p>	<ul style="list-style-type: none"> • Wildlife population increases and introductions can increase HWC • Law enforcement action may stimulate feelings of unhappiness, where e.g., laws were not fully enforced before (e.g. illegal hunting for subsistence); potential conflicts may arise • Continued anti-poaching support to community game guards in line with national laws (i.e., no firearms). • Conservancy boundaries must be gazetted, which could lead to boundary disputes. • Zonation and integrated land use maps, which will identify and delineate different types of land use as well as provide guidelines on what activities are and are not allowed, might result in conflicts, e.g., about grazing rights in Wildlife core Area Establishment • HWC Hotspot maps aren't easily accessible by conservancies • Quota setting is conducted in a scientific manner and provides for equity and equal opportunity between Conservancies as relevant in line with the national law and based on conservancy level game counts 	<ul style="list-style-type: none"> • Undertake relevant feasibility studies for wildlife re-introductions requested by Conservancies. Additionally, manage HWC to remove problem animals in line with conclusions from recently held HWC national conference (May 2023) • Train local communities on co-existence strategies, including enhanced understanding of wildlife movements; skills development on avoidance of HWC • Train law enforcement officers on conduct, community engagement and human-rights. • If determined necessary, have formally trained Law Enforcement staff accompany community guards in some areas • Development of a LRP if the ESS Screening detects the possibility of restriction of access to land or natural resources in any project activity, and/or law enforcement is engaged in relation to any project activity that might result in access restriction • Support MEFT and other law enforcement entities high training standards in line with national laws • The gazettement process includes community consultations (including 	<p>CTF (including but not limited to Safeguards Specialist)</p> <p>MEFT</p> <p>Extension service providers</p> <p>Conservancies</p> <p>WWF Namibia</p>

	<ul style="list-style-type: none"> • Fire management in areas where this is of significance conducted at community level may pose health risks to community members – as would no action • Risk of failing to appropriately include IPs who have limited (or lack) political and institutional representation • Potential for limited benefits from wildlife and natural resources in the Northwest, where there can be reduced participation and access to wider community benefits. 	<p>traditional authorities and members of the community) in line with the CBNRM policy</p> <ul style="list-style-type: none"> • Furthermore, the conservancies will conduct local-level mapping through local knowledge of the area as well as through the use of GPS devices and/or GIS, as set out in the CBNRM policy • Detailed boundary maps will be produced and hard copies of conservancy maps will be made available for distribution to conservancies and the Ministries of Agriculture, Water, and Land Reform and other users, in line with the CBNRM policy • The Natural Resource Working Group (NRWG), field NGOs, MEFT and conservancies will work together to execute and use zonation mapping, which will be done through a consultative process with community members and other stakeholders • The HWC hotspots maps will be developed together with conservancy members through highly consultative and participatory workshops and meetings at the centre/village/block level. An equitable data flow between conservancies and NRWG will also be established – in line with the recent commitments at a MEFT led HWC conference (May 2023). • Fire management will be executed with all safety measures in place, protecting the lives of local community members • Special attention will be paid to ensuring that consultation systems within the project are comprehensive and monitored, following ESSF and FPIC principles. This should include 	
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		<p>identification of such communities through document review, consultation with GRN and civil society, Traditional Authorities, Conservancies and communities, and subsequently ensuring the participation of San, Ovaherero and other marginalised groups in wider community meetings or, where not possible, targeted consultations and dissemination to that effect</p> <ul style="list-style-type: none"> • Inclusion of IP representation as part of Conservancy Governance, with an overall focus on ensuring participation of indigenous community members wherever relevant and that any benefits are equitable and appropriate. 	
<p>Payment for extension services from Endowment Disbursements: Institutional Development and Governance</p> <p><i>Legal and policy support, conservancy establishment, stakeholder engagement, conflict resolution, learning exchanges, and training on constitution implementation and amendments, Annual General Meetings, financial management and reporting, advocacy, etc.</i></p>	<ul style="list-style-type: none"> • Perpetuated gender imbalances in Conservancy governance and management • Potential conflicts within conservancies or amongst broader community over Conservancy matters • Potential conflicts about benefit distribution • Potential overburdening local communities with ESFM/IPPF requirements and other bureaucracies 	<ul style="list-style-type: none"> • Implement GAAP; train stakeholders in gender matters (potentially update existing NACSO training manuals) • Follow Conservancy national legal framework; apply inclusion, IPP and SEP best practices (NACSO; WWF) • Harmonize and rationalise ESFM/IPPF requirements so that they remain opportunities 	<p>CTF (including but not limited to Safeguards Specialist)</p> <p>MEFT</p> <p>Extension service providers</p> <p>Conservancies</p> <p>WWF Namibia</p>
<p>Payment for extension services from Endowment Disbursements: Business, Enterprise, & Livelihood Services</p> <p><i>Tourism planning, business planning and feasibility assessments, marketing, environmental assessments, tax assistance, contracts, insurance, product development, training on: finance and administration, communications, negotiations, infrastructure maintenance, etc.</i></p>	<ul style="list-style-type: none"> • Perpetuated gender imbalances in Conservancy governance and management • Potential conflicts within conservancies or amongst broader community over Conservancy matters • Potential conflicts about benefits and Business, Enterprise and Livelihoods (BEL) Working Group opportunities 	<ul style="list-style-type: none"> • Implement GAAP • Follow Conservancy national legal framework; apply inclusion, IPP and SEP best practices (NACSO; WWF) 	<p>CTF (including but not limited to Safeguards Specialist)</p> <p>MEFT</p> <p>Extension service providers</p>

WWF G0038 - Namibia COMPONENT: Environmental and Social Management Framework

			Conservancies WWF Namibia
Component 2: NOT APPLICABLE TO NAMIBIA			
Component 3: M&E and KM			
M&E	No adverse impacts expected	No adverse impacts expected	WWF

Please note that there is an entire section describing potential risks and mitigation measures specifically for Ips in Section 5.3 of this document (see below).

5 Indigenous Peoples Planning Framework (IPPF)

5.1 IP Population of Project Sites

In broad terms, indigenous peoples in Namibia could refer to Khoesan groups (the groups defined as San and the Nama) and various, interrelated Otjiherero-speaking pastoralist groups in northwest Namibia (namely, the Ovahimba, Ovatjimba, Ovazemba and the Ovatie – the latter being hunter-gathers historically, and also known as Ovatwa). In combination, these groups represent less than 8% of Namibia’s total population. Namibia rarely disaggregates data by ethnicity and disaggregation by language tends to focus only on larger language groups, hence population estimates for all these communities are limited.

The Government of the Republic Namibia (GRN) does not recognise the term “indigenous peoples” as commonly defined in international law. In common with a number of African states, GRN considers all “formerly disadvantaged” Namibians, i.e. those of non-European descent, to be indigenous and uses the preferred term, “marginalised communities” for groups that may be considered indigenous in international law.²⁹

In public documents, the Government of Namibia principally refers to the San, Ovatie and Ovatjimba groups as marginalised communities. The latter two groups, though distinct from one another, are related and share a common language, geographic area and aspects of their heritage, while the term “San” is a collective name for groups with comparable hunter-gatherer heritages and languages utilising ‘click’ consonants, but with their own group names, customs, culture, history and language. In Namibia, the 6 key San groups include the Hai|om, Khwe, !Kung, Ju’|hoansi (including #Au|eisi or “Omaheke Ju’|hoansi”), Naro and !Xoo. The estimated number of San is approximately 38,000, comprising about 1.6% of Namibia’s 2.3 million people.

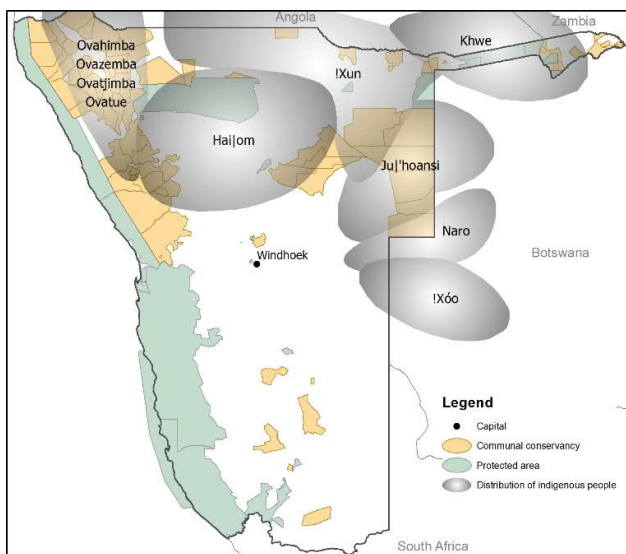


Figure 3: Map illustrating approximate locations marginalized communities/indigenous peoples in relation to the 86 conservancies in Namibia (Nacso, 2023; redrawn from UNDP/WIMSA).

For groups in the northwest, the populous Ovahimba (or Himba) peoples have self-identified as indigenous peoples in international meetings but are less frequently included in the marginalised communities grouping used by the GRN, perhaps due to their somewhat greater social and economic mobility. The Ovahimba, Ovatie, Ovatjimba and Ovazemba number approximately 25,000 people in total.

The groups specifically relevant to this project include the Khwe found in and neighbouring Bwabwata National Park, Hai|om populations found in areas bordering Etosha National Park, !Kung populations found north and east of Etosha National Park and in limited numbers in Bwabwata National Park, the Ju’|hoansi (including #Au|eisi or “Omaheke Ju’|hoansi”), Naro and !Xoo arounding Khaudum National park and the eastern conservancies and Ovahimba groups in the North West landscape area. The approximate extent of the populations of these groups is represented as an overlay on a map of Namibian Conservancies (Figure 3).

The Khwe (north-west, including Bwabwata National Park & Kyaramacan Association)

Perhaps the most complicated situation of the groups mentioned is the Khwe, who were the first known inhabitants of an area now included within the Bwabwata National Park (BNP), and who retain a strong concept

²⁹ While “marginalised communities” is a term used by the Namibian Government, the two terms are applied interchangeably.

of rights over the area. Before the onset of colonialism, the BNP area was part of a larger Khwe territory which included parts of Angola, south-western Zambia, the Zambezi Region and north-western Botswana. The area was first proclaimed as a Nature Reserve in 1937 and, later, as a Game Park. In the 1970s, the park was occupied by the South African Defence Force (SADF) and, until shortly before Namibian independence from South Africa in 1990, was used by the SADF to launch raids into Angola against the People's Liberation Army of Namibia (PLAN) (the military wing of the South West Africa People's Organisation, or SWAPO) insurgents and to support the Angolan rebel movement, UNITA (National Union for the Total Independence of Angola). The Khwe participated in the conflict primarily as trackers for the SADF. After Independence the area was proclaimed as a National Park in 2007.

The population of Khwe in the BNP has fluctuated but is likely approximately 5,000-6,000 people. A number of Mbukushu, a larger and politically dominant agropastoral group found to the west of Bwabwata, and smaller numbers of other groups, also live within the western area of park, predominantly as cattle herders and/or with small cropping activities. While other key San groups have leaders recognised by the government under the Traditional Authorities Act, the Khwe fall under the neighbouring Mbukushu Traditional Authority, which is the product of a largely subordinate relationship to that group over the last 200 years. This is a point of contention for many Khwe in BNP. Compounding governance issues, BNP is split between two administrative regions, Kavango East and Zambezi, which complicates service delivery to people living within the National Park.

The Khwe were traditionally hunters and gatherers, but also cultivated land and kept livestock, including cattle. Because of veterinary restrictions, few Khwe are now cattle owners and, beyond the limited resources of the Khwe, restrictions on livelihoods options exist due to park policies, zonation and human-wildlife conflict. The Khwe still gather veld food as an important part of their diet and hunting of small game may still occur in isolated areas. The government does not formally acknowledge the land rights of the Khwe in the park, but their presence on the land and rights to live there are implicitly acknowledged through government recognition of their representative body - the Kyaramacan Association (KA) - engagement in joint management activities between park residents and park officials, and through government awarding hunting and photographic tourism concessions to the San residents.

Kyaramacan Association (KA): MEFT activities and work with the Khwe community by the NGO Integrated Rural Development and Nature Conservation (IRDNC) led to the establishment of Kyaramacan Association in 2006 and is considered part of the conservancy system. The KA manages, in partnership with the MEFT, the designated 'multiple-use area' within the park where people live and employs community game guards. However KA and community activities have been curtailed to some level due to heightened elephant poaching in the area. The KA shares substantial income from two hunting concession, with approximately N\$5,000,000 (five million Namibian Dollars) in benefits accruing from trophy hunting in 2019. Hunting is the major source of income for the KA, despite some existing tourism concessions for non-resident communities to the east of the BNP, with some tourism concessions in the process of being developed for members of the KA. Twelve villages in BNP fall under the ambit of the KA constitution, including the major settlements of Mashambo, Omega III, Chetto, Omega and Mut'icku, and currently approximately 70 people are employed by KA on a full or part-time basis.

The !Kung (north-east and north-central Namibia; several conservancies esp N#a Jaqna)

The !Kung (also !Xun, !Xung) are perhaps the most widespread of Namibia's San. Hence, while having a common identity as !Kung, there are several distinct groups and the situation of !Kung varies from place to place. Among the main dialects, many !Kung living in northern Namibia are referred to as Vasekele !Kung (or Northern !Kung), though variants or sub-dialects exist such as Ekoka !Kung in Ohangwena Region, and Mpungu !Kung in Kavango West Region. As with many Namibian groups, a sizeable number of !Kung fled the 25-year civil war in Angola, and a proportion of these migrants and Namibian !Kung ended up serving in the SADF, as did the Khwe. Some were subsequently relocated to join other !Kung several hundred kilometres south to Tsumkwe West in Otjozondjupa Region, where a substantial population of !Kung now exists, with a recognised Traditional Authority.

However, the !Kung Traditional Authority has few dealings with !Kung in the North East and Central areas of Namibia, where they are mainly found as small populations, and fall under other (non-!Kung) Traditional Authorities, often resulting in inadequate representation. Hence the small population of !Kung in BNP - numbering only several hundred, mainly in the western area of the park - are considered more marginalised than the majority Khwe population.

The Vasekela, Ekoka and Mpungu !Kung traditionally occupied a wide wedge of land stretching southwards from the Angolan border towards Tsumeb. This area was split and incorporated into Kavango and Owamboland respectively under the colonial government, and later became the regions of Kavango East and West, Ohangwena, Omusati, Oshana, and Oshikoto. While low population densities and small numbers of migrants meant that the !Kung retained a degree of autonomy in the southern parts of this region, in the northern parts they largely ended up working as cheap labourers attached to Kavango and Ovambo households, and lived on the peripheries of larger settlements.

This situation has largely continued, and !Kung in these regions tend to comprise small populations living within areas dominated by more numerous groups. In common with many San, the !Kung largely survive through income from informal labour, government grants, government food relief and subsistence agriculture, and the levels of representation and socioeconomic conditions are especially poor in a number of areas. !Kung found in regions such as Omusati and Oshana have widely adopted the Oshivambo language, and are somewhat but certainly far from fully integrated with their neighbours.

Most !Kung settlements in North Central Namibia are characterised by insecure land tenure, high levels of poverty in comparison with neighbouring groups, poor labour relations with neighbouring groups, and a lack of representation. Small numbers of !Kung may be found in the North West hotspot landscape, but information about these groups is limited. In similarity to the Hai||om, Ovahimba and Ovatie, the degree to which the !Kung are involved in conservancy management and CBRNM decision-making is limited.

The Hai||om (north-central Namibia; Etosha)

The Hai||om are a widespread group, historically living in and around the area that is now Etosha National Park (ENP) and east of the park towards Tsumeb, and now numbering approximately 10,000 people, though data is scarce. Those living north of ENP were largely displaced to the south by the expansion of majority groups, though limited numbers remain in the area. The removal of most Hai||om from ENP in the 1950s and 1960s led many Hai||om to become itinerant farm labourers, or both landless and unemployed, and subsequent generations have largely remained landless and with reduced livelihood opportunities.

The Hai||om have a recognised Traditional Authority, with whom the government enacted the purchase of resettlement farms south and south-east of the ENP border to provide land. Sizable numbers of Hai||om have moved to this area, though the productivity of the purchased farms, limited service provision, limited technical assistance and current lack of tenure (it remains state land), pose challenges to the success of this resettlement programme. The Traditional Authority did not support the more than 2,000 adult Hai||om who indicated support for a land claim against the government for their loss of ENP as ancestral land, and the claim was dismissed by the High Court in 2019 (though is subject to appeal).

It is worth noting that several arrests for rhino poaching incidents in 2015 were reportedly traced back to Hai||om who come from remote villages north-west of Etosha, south of Okahao, and who had been paid by wealthy individuals from outside of their immediate communities to engage in poaching activities. As with the !Kung in the North-Central area, the small number of Hai||om north-west of Etosha have partially assimilated with their Oshivambo-speaking neighbours. On the other hand, the Hai||om resettlement farms south and south east of Etosha have not shown evidence of poaching activities, and form a buffer zone between the ENP and commercial farms; these resettlement farms hold significant potential for conservation efforts.

The Ju|'hoansi (Eastern Namibia; Nyae Nyae Conservancy)

Ju|'hoan, also known as Southern or Southeastern !Kung or !Xun, is the southern variety of the !Kung dialect continuum, spoken in northeastern Namibia and the Northwest District of Botswana by San Bushmen who largely identify themselves as *Ju|'hoansi*. Several regional dialects are distinguished: Epukiro, Tsum!kwe, Rundu, Omatako and #Kx'aull'ein, with Tsum!kwe being the best described and often taken as representative. The Nyae Nyae Conservancy in eastern Namibia is inhabited and managed by the Ju|'hoansi. Ondjou Conservancy further south still falls into Ju|'hoansi distribution areas, but is dominantly inhabited by Otjihero people. The Nyae Nyae Development Trust and Foundation were set up as organisations representing the Ju|'hoansi and supporting their development as well as representation in the Conservancy.

The Naro and the The !Xóo (Eastern Namibia; mostly Botswana)

The Naro and !Xóo San mostly live in western Botswana but have some geographical extent into Namibia, however not represented in Conservancies.

The Ovahimba and Ovatue (north-western Namibia)

The Ovahimba³⁰, Ovatjimba, Ovazemba and Ovatue (Ovatwa) are Oshierero-speaking pastoralist groups inhabiting North West Namibia (see Figure 1). These groups are well known in Namibia and abroad for their appearance, including the application of red ochre to the skin by women. The Ovahimba, Ovatjimba and Ovazemba are pastoralists who share a similar cultural and livelihoods heritage. Historically, the Ovatue were hunter-gatherers as well as cattle owners, and appear to be viewed as subordinate by the other groups. These groups are descendants of early Bantu migrants into southern Africa and are related to the Ovaherero. Many Ovahimba, Ovatjimba, Ovazemba and Ovatue still wear traditional dress and have few material possessions because of their semi-nomadic lifestyle. The Ovatue remain poor and with limited cattle ownership in comparison to other groups.

The more populous Ovahimba (or Himba) people self-identify as indigenous peoples but are rarely included in the “marginalised communities” grouping used by the GRN, perhaps due to their somewhat greater social and economic mobility. In contrast, the Ovatue are a focus of the GRN programme and the Ovatjimba are frequently included. Information on Namibia’s small population of Ovazemba is limited, but they are generally regarded as separate from, but comparable to, the Ovahimba, and these groups cooperate politically at times. Traditional Authorities within the Ovahimba, Ovatjimba, Ovazemba and Ovatue remain contentious, with complaints of poor representation made at various times over previous years by interest groups within their communities. This included the High Court setting aside of recognition of the Traditional Chief of the Ovahimba in 2018 by the then Minister of Urban and Rural Development, after members of Ovahimba community complained about the recognition process, and of the chief’s decision to support the contentious Baynes Dam development.³¹

These semi-nomadic pastoralists in the past maintained biodiversity and largely undisturbed landscapes through their traditional range management systems. However, the provision of artificial water points, socio-economic and population changes have considerably disrupted the traditional grazing systems of these pastoralists, resulting in overstocking and widespread overgrazing in the vicinity of natural and artificial water points. This has led to groups grazing further south on the communal land of other communities, including within conservancies, which, of course, leads to local conflict. Groups of Ovahimba can also be seen in areas west of Etosha – some are resident there, others come in small groups to attempt to earn money from tourists, for example from crafts and photographs, in popular locations.

5.2 Project Impacts on IPs Groups

Indigenous peoples including vulnerable groups might not engage in, support, or benefit from project activities. The policy and operating environment of Namibia in relation to indigenous peoples is relatively progressive and stable. Namibia has a well-defined rule of law and democratic principles, low levels of unjustified detention, and GRN has established a Division of Disability Affairs and Marginalized Communities within the Ministry of Gender Equality, Poverty Eradication and Social Welfare. A “White Paper on the rights of indigenous peoples in Namibia” has been developed.

A number of implementation risks to the Project remain due to the minority and marginalised position of Namibia’s indigenous peoples/marginalised communities. These include but are not limited to:

- i) Representation and participation – While the Ovahimba, Ovazemba and Ovatjimba have limited representation, the San and Ovatue are both minority populations and lack strong political and institutional representation in the project landscapes. In general, levels of formal education and technical experience are also lower within San and Ovatue communities compared with national averages, and, in the case of the San, cultural approaches to disagreements have traditionally leaned towards avoiding direct disputes and therefore a historical erosion of land, resource and livelihood rights ensued. These factors, among other

³⁰ The “Ova” prefix indicates plural

³¹ See <https://www.nampower.com.na/Page.aspx?p=222> and <https://www.internationalrivers.org/blogs/1259/with-a-new-dam-proposed-on-the-kunene-river-the-himba-people-mobilize-to-permanently>

issues, often result in weaker representation and limited established rights in comparison to other groups represented in Conservancies. Notably, certain conservancies are composed mostly of IPs, such as the Marienfluss Conservancy in the north-west of Namibia and the Kyaramacan Association is representing i.e the Khwe and !Kung San alongside a smaller number of other groups, including the Mbukushu in the Bwabwata National park. Therefore, special attention should be paid to ensuring that consultation systems within the project are comprehensive and monitored, following ESSF and FPIC principles. This should include identification of such communities through document review, consultation with GRN and civil society, Traditional Authorities, Conservancies and communities, and subsequently ensuring the participation of San, Ovatie and other marginalised groups in wider community meetings or, where not possible, targeted consultations and dissemination to that effect. Such approaches must also take into account balanced gender and youth participation.

- ii) Potential for limited benefits from wildlife and natural resources in Community Conservancies – in the North West, the limitations highlighted above can potentially result in reduced participation and access to wider community benefits from wildlife and natural resources. Therefore, principles of consultation and inclusion are established within the project's framework when planning and implementing activities around increasing benefits from wildlife and natural resources. For example, this might include ensuring that a IPs (e.g. San or Ovatie) community-nominated representative is included in Conservancy decision-making processes where activities may involve IPs. Potentially include such a consideration in the Governance Guidance of NACSO.
- iii) Language – consultation and dissemination within the project with all local communities should take into account language barriers, and utilise translation as required, with increased attention given to minority languages such as those spoken by San communities, especially where secondary language use is limited.

Preliminary FPIC consultations have been carried out as part of the overall Community Conservation/CBNRM Programme. Further consultations are currently underway as part of a consultancy undertaken by UNAM for WWF and the PFP in particular, to mitigate potential risk and engage indigenous peoples in the Project.

5.3 Mitigation Planning

Mitigation Action: A detailed Indigenous Peoples Plan is currently being formulated for the overall CBNRM programme including the PFP and will be completed before the closing of the PFP in December 2024. Although guided by the IPPF laid out here, the aforementioned Plan will inform future project-specific IPPs.

Additionally, the Project's Stakeholder Engagement Plan takes account of factors noted above, including the use of appropriate language, engagement of youth and use of consultation. FPIC consultations must be carried out for certain PFP activities in the future on a case-by-case basis, depending on the application of the funding in areas and community conservancies where IPs are present.

At this stage, mitigation planning will consider the following:

1. Regular consultations will be held with the IPs, including the women, to seek their informed participation both in assessing potential impacts and in designing mitigation measures and project intervention at all stages of project preparation and implementation. Using participatory methods, the CTF established in Namibia, together with UNAM and WWF, will build upon WWF's established long-term community relations and knowledge of community governance structures to ensure IP engagement with the project.
2. As an ongoing process, where potential negative impacts are identified, the scope and impact of these impacts will be assessed, and appropriate mitigation measures designed.
3. Where IP groups may be affected, site specific Indigenous Peoples Plan (IPPs, see below) should be prepared considering best options and approaches that are in accordance with the needs and interests of affected individuals and communities. Specifically, the social and cultural context of affected IPs and their traditional skill and knowledge in natural resource management should be considered in this regard.
4. Community organizations, NGOs, and other stakeholders experienced in executing IP projects or supporting those communities will be engaged and consulted to ensure accurate information and, if feasible, coordination.

5. In the IPPs, indicators will be defined for periodic monitoring of the progress of relevant planned activities in order to confirm their effectiveness, and to plan and undertake alternative measures as appropriate.

Key issues that have been identified and will be mitigated for include the following (Table 9).

Table 9: Potential IP risks pertaining to the identified risk categories and suggested mitigation actions

Risk category	Potential risk	Mitigation action
Indigenous peoples including vulnerable groups might not engage in, support, or benefit from project activities	<p>Limited representation and participation of IPs in CCs</p> <p>Underrepresentation of minority groups incl. women and youth of various IPs</p> <p>Potential for limited benefits from wildlife and natural resources</p> <p>Language barriers</p> <p>Bwabwata National Park & KA unequal representation of minority groups</p> <p>Unscrupulous business partners (hunting, tourism, other) take advantage of IPs</p>	<p>Several CCs are fully managed by IPs. However, representation of people's rights needs to be guarded</p> <p>Include IP representation where no Traditional Authority is in place to represent IPs</p> <p>Implement specific support interventions for IPs</p> <p>Provide access to special support services as requested</p> <p>Provide for abuse reporting e.g. linked to GRM</p> <p>Make provision for translation into vernacular as appropriate</p>
Law enforcement and anti-poaching patrols could pose safety risks to local communities if they are not properly trained, managed or overseen	<p>MEFT and other LE officers harm local community members</p> <p>Game guards may use force against IPs/marginalized peoples during anti-poaching missions</p> <p>San anti-poaching trackers at risk</p>	<p>Any LE officers to be trained on IP issues and Human Rights</p> <p>Game guards carry no weapons, but should be trained on IP issues</p> <p>Review safety plans of San trackers and anti-poaching units in line with national laws</p>
Potential changes to current access to CCs, PAs and resources, potentially leading to economic displacement and/or changes to property rights	<p>IP rights to utilization of wildlife and non-timber forest products, Devils Claw etc. may change and put livelihoods at risk</p> <p>Rights to livestock grazing may be newly guided and livestock-free areas be declared</p> <p>Drought emergency grazing areas might be contested with wildlife (e.g. carnivores)</p>	<p>Screen for vulnerability and potential impacts; even if quotas have to be adjusted, ensure that livelihoods of vulnerable people will not be negatively affected</p> <p>Develop provisions that do not put people at risk, but also ensure adaptive management of livestock esp. in drought years</p> <p>Keep traditional Ovatie emergency grazing areas as mixed used areas; with the caveat that HWC will need to be managed</p> <p>Livelihood Restoration Plans (LRPs) will be created using the guidance included in this document (see Appendix V) in the event that access to resources is effectively affected during project implementation.</p>
Relocation of indigenous peoples	Not foreseen in this project	N/a

from their lands and territories		
Protecting traditional knowledge and cultural heritage	National guidance for CC management may superimpose on traditional knowledge systems Country/national legislation may force cultural changes (e.g., law to send children to school)	Value traditional knowledge and cultural heritage through specific support projects (e.g., tourism route between Ngamiland and Nyae Nyae)

The project will allocate sufficient budget for the implementation of any necessary IPPs. Specific IPPs will be unique to each community (or multiple communities under a single governance structure), and their internal decision-making processes, but should follow a template created by the ESS Officer within in the CTF and approved by the Safeguard Specialist within the WWF US GEF Agency.

Responsibility for mitigation planning, including the development of IPPs will lie with the Safeguards specialist in the CTF, under the overall coordination of the M&E Specialist or ESSF Specialist within the global PMU established by TNC, the executing entity for the overall for the entire “Enduring Earth” PFP project (TNC).

5.4 Steps for Formulating an IPP

WWF’s Standard on Indigenous People requires that, regardless of whether Project affected IPs are affected adversely or positively, an IPP needs to be prepared with care and with the full and effective participation of affected communities.

The requirements include screening to confirm and identify affected IP groups in the project areas, social analysis to improve the understanding of the local context and affected communities; a process of free, prior, and informed consent with the affected IPs’ communities in order to fully identify their views and to obtain their broad community support to the project; and development of project-specific measures to avoid adverse impacts and enhance culturally appropriate benefits.

Minimum requirements for projects working in areas with IPs are:

- Identification of IP groups through screening;
- Assessment of project impacts;
- Consultations with affected IP communities following FPIC principles and obtain their broad community support;
- Development of sites specific IPs plan (IPP) to avoid adverse impacts and provide culturally appropriate benefits; and
- In activities with no impacts, the requirements could be limited to consultations during implementation to keep local communities informed about project activities and documentation of all consultations held.

UNAM has been commissioned to undertake consultations for the national Community Conservancy/CBNRM programme to inform the formulation of the ESMP and IPP that will be developed following this ESMF and IPPF. The consultative work will be completed before closing of the PFP deal in December 2024 and its provisions will apply to the PFP.

5.5 Social Assessments

WWF’s Standard on Indigenous People requires screening for IPs to assess risks and opportunities and to improve the understanding of the local context and affected communities. Aside the implementation of the consultative work conducted by UNAM, various other assessments are currently underway: The NACSO Secretariat is working with various San groups in the Kavango East Region on integrating their concerns in community conservation and into local Conservancy structures. Detailed IPPs for local level engagements will

be developed and tested. A grievance mechanism set up for local community conservancies and the wider community is being piloted as an input to the national CBNRM programme. In preparation of a project in Khaudum National Park and Community Conservancies towards the south and west, community assets mapping is undertaken by local communities, guiding priority identification in conservancies. The Nyae Nyae and N=ǀa Jaqna conservancies, with a majority membership of San group representatives are taking the lead in these participatory processes.

The Project level ESS Screening (Annex IV of this ESMF) is completed yearly during the Annual Workplan development to screen for and assess these risks and opportunities, as well as before each grant to a service provider/conservancy is approved and disbursed.

A description of activities that may result in adverse social impacts on IPs is presented in section 5.2, but will be revisited during project implementation during this annual screening.

5.6 Development of IP Plans (IPP)

Based on the results of the social assessments, individual and Conservancy specific IPPs shall be developed, based on an overall IPPF for the overall CBNRM programme and the PFP (aligned with this GEF ESSF & IPPF). To comply with GEF standards, additional IPPs shall be developed during implementation based on the results of the project-level screening form (Annex IV) and applied to each individual grant assigned to service providers or Conservancies.

The contents of the IPP(s) will depend on the specific activities identified and the impacts these activities may have on IPs in the project area, and will be guided by the IPPF. As a minimum, an IPP should include the following type of information:

- ✓ Description of the IPs affected by the proposed activity;
- ✓ Summary of the proposed activity;
- ✓ Detailed description of IPs' participation and consultation process during implementation;
- ✓ Description of how the project will ensure culturally appropriate benefits and avoid or mitigate adverse impacts;
- ✓ Budget;
- ✓ Mechanism for complaints and conflict resolution; and
- ✓ Monitoring and evaluation system that includes monitoring of particular issues and measures concerning indigenous communities.

5.7 Free, Prior and Informed Consent Framework

Free, Prior and Informed Consent (FPIC) is an approach for ensuring that the rights of IPs are guaranteed in any decision that may negatively affect their lands, territories or livelihoods. It ensures that they have the right to give or withhold their consent to these activities without fear of reprisal or coercion, in a timeframe suited to their own culture, and with the resources to make informed decisions.

FPIC is composed of four separate components:

- Free—Without coercion, intimidation, manipulation, threat or bribery.
- Prior—indicates that consent has been sought sufficiently in advance, before any project activities have been authorized or commenced, and that the time requirements of the indigenous community's consultation/consensus processes have been respected.
- Informed—Information is provided in a language and form that are easily understood by the community, covering the nature, scope, purpose, duration and locality of the project or activity as well as information about areas that will be affected; economic, social, cultural and environmental impacts, all involved actors, and the procedures that the project or activity may entail.
- Consent—The right of IPs to give or withhold their consent to any decision that will impact their lands, territories, resources, and livelihoods.

The processes of consultation and obtaining FPIC will be applied to all the aspects of the project (financed under WWF) that may negatively affect the rights of the IPs and ethnic minorities. FPIC will be required on any matters

that may negatively affect the rights and interests, water areas, lands, resources, territories (whether titled or untitled to the people in question) and traditional livelihoods of the IPs concerned.

Thus, FPIC is integral to the execution of the proposed project, as the project areas includes diverse indigenous communities. WWF recognizes the strong cultural and spiritual ties many IP groups have to their lands and territories and committed to strengthen these ties in all WWF GEF funded projects. FPIC gives IPs the freedom to determine their own development path to promoting conservation sustainably. The following checklist (Box 1) may assist in helping to determine whether some Project activities may require an FPIC process

<p>Box 1. Checklist for appraising whether an activity may require an FPIC Process</p> <ol style="list-style-type: none">1. Will the activity involve the use, taking or damage of cultural, intellectual, religious and/or spiritual property from IPs?2. Will the activity adopt or implement any legislative or administrative measures that will affect the rights, lands, territories and/or resources of IPs (e.g. in connection with the development, utilization or exploitation of mineral, water or other resources; land reform; legal reforms that may discriminate de jure or de facto against IPs, etc.)?3. Will the activity involve natural resource extraction such as logging or mining or agricultural development on the lands/territories of IPs?4. Will the activity involve any decisions that will affect the status of IPs' rights to their lands/territories/water resources, resources or livelihoods?5. Will the activity involve the accessing of traditional knowledge, innovations and practices of indigenous and local communities?6. Will the activity affect IPs' political, legal, economic, social, or cultural institutions and/or practices?7. Will the activity involve making commercial use of natural and/or cultural resources on lands subject to traditional ownership and/or under customary use by IPs?8. Will the activity involve decisions regarding benefit-sharing arrangements, when benefits are derived from the lands/territories/resources of IPs (e.g. natural resource management or extractive industries)?9. Will the activity have an impact on the continuance of the relationship of the IPs with their land or their culture?10. Will the interventions/activities restrict on access to non-timber forest products (NTFPs), timber, lands, etc. and other sources of livelihoods and community resources?

If the answer is 'Yes' to any of these questions in Box 1, it is likely that FPIC will be required of the potentially affected indigenous peoples for the activity that may result in the impacts identified in the questions. When an FPIC process is required, a stakeholder consultation process will need to be initiated to define and agree on an FPIC process with the community or communities. The IPs who may be affected by the Project will have a central role in defining the FPIC process, based on their own cultural and governance practices. The consultation process should be launched as early as possible to ensure full, effective and meaningful participation of IPs.

All consultations with IPs should be carried out in good faith with the objective of seeking agreement or consent. Consultation and consent is about IPs' right to meaningfully and effectively participate in decision-making on matters that may affect them. Consultations and information disclosure are integral parts of FPIC process and any development support planning for IPs to ensure that the priorities, preferences, and needs of the indigenous groups are taken into consideration adequately. With that objective in view, a strategy for consultation with IPs has been proposed so that all consultations are conducted in a manner to ensure full and effective participation. The approach of full and effective participation is primarily based upon transparent, good faith interactions, so that everyone in the community is empowered to join fully in the decision-making process. It includes providing information in a language and manner the community understands and, in a timeframe, compatible with the community's cultural norms.

The affected IPs will be actively engaged in all stages of the project cycle, including project preparation, and feedback of consultations with the IPs will be reflected in the project design, followed by disclosure. Their participation in project preparation and planning has informed project design and will continue to actively participate in the project execution. Once the IPP or LRP is prepared, it will be translated into local languages (as applicable) and made available to them before implementation, including in formats other than written documents if and when requested by the communities.

The Conservation Trust Fund (CTF) shall ensure adequate flow of funds for consultation and facilitation of planned activities within the IPP. Project brochures and pamphlet with infographic containing basic information

such as sub-project location, impact estimates, and mitigation measures proposed, and implementation schedule will be prepared, translated into a language understandable to the IPs, and distributed among them. If literacy is low in the communities, other means of communication must also be agreed upon with them, especially targeting community members who may have lower literacy levels.

A range of consultative methods will be adopted to carry out consultation including, but not limited to: focus group discussions (FGDs), public meetings, community discussions, and in-depth and key informant interviews; in addition to the censuses and socioeconomic surveys.

The key stakeholders to be consulted during screening, impact assessment; design and implementation of IPP, and Process Framework include:

- Conservancies with IPs/marginalized groups and IP representatives;
- Appropriate government Departments/Ministries
- Relevant NGOs
- Provincial and municipal government representatives;
- Relevant community cooperatives, management structures, umbrella bodies, etc;
- The private sector:
- Academia representatives.

The project will ensure adequate representation of each group of stakeholders mentioned above while conducting consultations using various tools and approaches.

The views of IPs communities are to be considered during execution of project activities, while respecting their practices, beliefs and cultural preferences. The outcome of the consultations will be documented into the periodical reports and included in project's trimester progress reports. The Project Manager with support of the Safeguards Specialist will also ensure that affected persons are involved in the decision-making process.

Procedures to seek FPIC

Project interventions and activities adversely affecting the IPs, therefore, need to follow a process of free, prior, and informed consent, with the affected IPs in order to fully identify their views and to seek their broad community support to the project; and development of project-specific measures to avoid adverse impacts and enhance culturally appropriate benefits.

Community involvement is a critical component of FPIC, as FPIC is a collective process, rather than an individual decision. In practice, FPIC is implemented through a participatory process involving all affected groups that is carried out prior to the finalization or implementation of any project activities, decisions or development plans. FPIC is established through good faith negotiation between the project and affected IPs. A facilitator should support this process, a person who will be available throughout the Project, who speaks the necessary languages and is aware of the project context. This person may or may not be part of the PMU/CTF, but should be agreeable to all parties involved.

Box 2 below outlines some generic steps to be followed for FPIC with the affected IPs in order to seek their broad community support.

Box 2. Steps for Seeking FPIC from Project Affected Indigenous Peoples

1. Identify communities, sub-groups within communities, and other stakeholders with potential interests/rights (both customary and legal) on the land or other natural resources that are proposed to be developed, managed, utilized, or impacted by the proposed project activity.
2. Identify any rights (customary and legal) or claims of these communities to land or resources (e.g., water rights, water access points, or rights to hunt or extract forest products) that overlap or are adjacent to the site(s) or area(s) of the proposed project activity;
3. Identify whether the proposed project activity may diminish the rights, claims, or interests identified in Step 2 above and also identify natural resources that may be impacted by this project and the legal and customary laws that govern these resources;

4. Provide the details of proposed project activities to be implemented along with their likely impacts on IPs either positively or negatively, as well as the corresponding proposed mitigation measures in a language or means of communication understandable by the affected IPs;
5. All project information provided to IPs should be in a form appropriate to local needs. Local languages should usually be used and efforts should be made to include all community members, including women and members of different generations and social groups (e.g. clans and socioeconomic background);
6. Selection of facilitator, who will be available throughout the Project, who speaks the necessary languages and is aware of the project context, and is culturally and gender-sensitive. The facilitator should be trustworthy to affected IPs. It will also be helpful to involve any actors which are likely to be involved in implementing the FPIC process, such as local or national authorities
7. If the IP communities are organized in community associations or umbrella organizations, these should usually be consulted.
8. Provide sufficient time for IPs' decision-making processes (it means allocate sufficient time for internal decision-making processes to reach conclusions that are considered legitimate by the majority of the concerned participants)
9. Support a process to create a mutually respected decision-making structure in cases where two or more communities claim rights over a project site.
10. If FPIC is not familiar to the community, engage in a dialogue to identify existing decision-making structures that support the principles underlying FPIC.
11. Identify the community-selected representative(s) or "focal people" for decision making purpose-- identification of the decisionmakers and parties to the negotiation.
12. Agree on the decisionmakers or signatory parties and/or customary binding practice that will be used to conclude the agreement, introducing the chosen representatives, their role in the community, how they were chosen, their responsibility and role as representatives;
13. If consent is reached, document agreed upon outcomes/activities that are to be included into the project, and agree on a feedback and a project grievance redress mechanism. Agreements reached must be mutual and recognized by all parties, taking into consideration customary modes of decision-making and consensus-seeking. These may include votes, a show of hands, the signing of a document witnessed by a third party, performing a ritual ceremony that makes the agreement binding, and so forth;
14. When seeking "broad community consent/support" for the project, it should be ensured that all relevant social groups of the community have been adequately consulted. This may mean the project staff have to seek out marginalized members, or those who don't have decision-making power, such as women. When this is the case and the "broad" majority is overall positive about the project, it would be appropriate to conclude that broad community support/consent has been achieved. Consensus building approaches are often the norm, but "broad community consent/support" does not mean that everyone has to agree to a given project;
15. When the community agrees on the project, document the agreement process and outcomes including benefits, compensation, or mitigation to the community, commensurate with the loss of use of land or resources in forms and languages accessible and made publicly available to all members of the community, providing for stakeholder review and authentication;
16. The agreements or special design features providing the basis for broad community support should be described in the IPs Plan; any disagreements should also be documented; and
17. Agree on jointly defined modes of monitoring and verifying agreements as well as their related procedures: how these tasks will be carried out during project implementation, and the commission of independent periodic reviews (if considered) at intervals satisfactory to all interest groups.

5.8 Disclosure

The final IPPF and any site specific IPPs will be disclosed on the website of the executing agency and the website of WWF and made available to affected IPs; information dissemination and consultation will continue throughout project execution. Summaries of IPPs and mitigation measures proposed in IPPs will be translated into appropriate national languages and paper copies will be made available to the affected persons in the office of relevant local authorities.

5.9 Institutional and monitoring arrangements

The staff responsible for Safeguards will be responsible for the development and implementation of the IPPF and any IPP, with support from the Project/Fund Manager on logistical matters (e.g., conducting field visits, reaching out to IP communities, convening meetings, etc.).

The Safeguards person will periodically report on the implementation of the IPPF/IPP to the Project/Fund Manager, executing agency and WWF. Monitoring and reporting will be undertaken together with reporting on the other ESMF commitments.

6. Pest Management Plan

The project will adopt an integrated pest management approach (which considers cultural, mechanical, physical and chemicals methods), which includes among others:

- Minimal soil disturbance (through reduced or no-tillage) in order to preserve soil structure, soil fauna and organic matter;
- Permanent soil cover (cover crops, residues and mulches) to protect the soil and contribute to the suppression of weeds;
- Diversified crop rotations, and crop combinations, which promote soil micro-organisms and disrupt plant pests, weeds and diseases;

Where pesticides are needed, as a last resort, only green and blue label pesticides would be applied. Where the use of pesticides cannot be avoided, the project will build knowledge regarding the advantage and disadvantage of their use and, where appropriate, will train farmers on application rates, techniques and equipment, disposal of empty containers and remaining/unused pesticides mixtures. In all cases, the project will comply with FAO's International Code of Conduct on the Distribution and Use of Pesticides and its associated technical guidelines, 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.

7. Capacity Building

Capacity building will be provided as needed by WWF US to the executing entity. Furthermore, and on a needs basis, experts and independent consultants with relevant expertise in social and environmental safeguards in Namibia will be engaged to support with this ESMF implementation requirements and good practices as well as the completion of the ESMP(s), IPPs, organization of consultations, operationalization of Grievance Redress Mechanism (GRM) and monitoring of ESMF implementation. WWF US will provide an induction session for the CTF and all relevant project partners, as needed, on safeguards responsibilities and approaches. Capacity building activities will be provided as needed by WWF US to executing agency/Fund Manager to provide the latter with ESMF and IPPF implementation requirements and good practices. The budget for capacity building shall be included in Component 1 as appropriate.

UNAM is being commissioned to undertake all relevant local level consultation in communities for the WWF Country ESMF and IPPF, as well as for an ongoing work on gender. As this work focuses on the same 86 community conservancy and WWF's ongoing engagement in supporting extension services and additional project interventions, there is a complete overlap and alignment between the GEF project ESFM and the country ESFM. The UNAM team is tasked to produce and deliver all trainings/ communications within the communities in an accessible manner, including in vernacular languages. Special emphasis is placed on explaining FPIC and the accessibility of a grievance mechanism. The UNAM team has almost an entire year to undertake this task.

Notably, in Namibia, the NACSO partners have already formed an inter-institutional coordination group that is tasked with harmonization of ESSF approaches and procedures programme and nation-wide. The vision is for each organisation to follow a similar approach and use similar tools. WWF Namibia has been in a lead sharing the "WWF ESSF toolbox" and adapting it to the local conditions. The Namibian CBNRM organisations are clear that an outreach to local communities on the ESSF and ESMP needs to be harmonised and rationalized, as the various donor needs and approaches cause a fair amount of confusion and duplication. Existing governance structures such as the bi-annual Chairmen's Forum of the Community Conservancies conducted on a regional level, will be operationalised to serve as stakeholder engagement platform on ESSF related matters for all NACSO partners.

The Fund Manager/CTF Board and staff will have final responsibility for the integration of the management plans into the disbursement of the endowment fund (and other financing available to the project, as applicable). The integration of those plans will need to be considered, particularly the institutional needs within the implementation framework for application of the management plan(s), including a review of the required budget allocations for each measure, as well as the authority and capability of institutions at different administrative levels (e.g. local, regional, and national), and their capacity to manage and monitor management plan implementation. Where necessary, capacity building and technical assistance activities will be included to enable proper implementation of the management plan(s).

8. Implementation Arrangements

As stated in the ProDoc, PFP funds will be managed by a Fund Administrator in accordance with operation manuals developed on the basis of internationally recognized good practices as set out in the GEF-supported practice standards for conservation trust funds to ensure transparency and good governance (including a diverse, independent board of directors/oversight committee, an internationally recognized asset manager, sound investment policy, *inter alia*). Careful staffing arrangements, capacity support, and project oversight from the WWF GEF Agency will ensure that the new fund is able to manage GEF funding, including adhering to policies and procedures with respect to safeguards.

GEF funding will in part support a financial manager/officer, an M&E officer, and a Safeguards officer in the CTF, who will ensure management and reporting against the GEF funding in the transition fund and the endowment fund. PFP operating manuals will define operating rules and processes, and specify responsibilities.

8.1 Procedures for the Identification and Management of Environmental and Social Impacts

The following is an exclusion list of activities that will not be financed by the *Enduring Earth: Accelerating Sustainable Finance Solutions to Achieve Durable Conservation* 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 Safeguards Specialist should fill in detailed information regarding the nature of the activity and its specific location in the *Safeguards Eligibility and Impacts Screening* form (Annex 4). 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 laws and regulations in Namibia. 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. Need for government-land acquisition;
- b. Environmental impacts (e.g., dust, noise, smoke, ground vibration, pollution, flooding, etc.) and loss or damage to natural habitat;
- c. Social impacts: identification of vulnerable groups or indigenous peoples, impacts on community resources, impacts on livelihoods and socio-economic opportunities, restrictions of access to natural resources, land usage conflicts, impacts on tangible or intangible cultural heritage, etc.; and
- d. Health and safety issues (both for workers and for local communities).

The screening of each activity should be undertaken by the 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 Safeguards Specialist, in collaboration with the Project Manager(s).

8.2 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 activities enabled by the matured endowment fund, the Safeguards Specialist in collaboration with the Project/Fund 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.

This will apply to activities that will be funded through the Endowment Fund component of the Namibian PFP. The following section sets out guidance on how such specific ESMPs would be developed. Notably, the below is guidance only and may need to be updated by the time the provisions will come into action, potentially in 2029, after the maturation period of the Endowment.

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.

8.3 Stakeholders' Roles & Responsibilities in the ESMF Implementation

(a) General

The institutional arrangement for project implementation includes WWF US as the GEF Agency, The Nature Conservancy (TNC) as the Lead Executing Agency, a Global Steering Committee. In Namibia, a Fund Manager will be in charge of managing and administering the Sinking and Endowment Fund. While the identification and selection of the Fund Administrator is still ongoing for the Namibian *EE-Accelerating Sustainable Finance Solutions to Achieve Durable Conservation* project component, a final governance structure has been conceptualized. The final details will be clear and agreed to by December 2024, when the "Closing of the Deal" is accomplished. The Operational Manual, which is being developed in the next 18 months, will lay out the final agreements and details.

As the Lead Executing Agency for the Global GEF project, The Nature Conservancy (TNC) will be responsible for overseeing the implementation of all project activities. A Project Management Unit (PMU) will be established within TNC to manage the project.

A Global Project Steering Committee (PSC) will be responsible for supervising and monitoring the technical and financial execution of the project, including the fulfilment of the Results Framework, and approving annual work plans and budgets, among others.

A Fund Administrator will be an Executing Partner. PFP funds will be managed in accordance with internationally recognized good practices as set out in the GEF-supported practice standards for conservation trust funds. A due diligence assessment of an existing CTF in Namibia is in process at the time of first submission (June 2023).

WWF GEF Agency: WWF-US, through the WWF GEF Agency will: (i) provide consistent and regular project oversight to ensure the achievement of project objectives; (ii) liaise between the project and the GEF Secretariat; (iii) report on project progress to GEF Secretariat (annual Project Implementation Report); (iv) ensure that both GEF and WWF policy requirements and standards are applied and met (i.e. reporting obligations, technical, fiduciary, M&E); (v) approve annual workplan and budget; (vi) approve budget revisions, certify fund availability and transfer funds; (vii) organize the terminal evaluation and review project audits; (viii) certify project

operational and financial completion, and (ix) provide no-objection to key terms of reference for project management unit.

(b) Roles and responsibilities ESMF and subsequent management plan implementation

The roles and responsibilities of project staff, project partners and associated groups in implementation of this ESMF are described below. As mentioned above, the details with respect to final governance structures of the project are being finalized for the Namibia components of the *Project*; that is, while it is known (a) that a Fund Administrator will operate as the executing entity for this project's targeted geography and (b) the practice standards they should follow, the precise identity of said Fund Administrator is being determined. All final details will be clear and agreed to by December 2024, when the "Closing of the Deal" will be accomplished. The Operational Manual, which is being developed in the next 18 months, will lay out the final agreements and details.

WWF-US GEF Agency:

- Provide oversight on all matters related to safeguards.
- Provide technical guidance on implementation of this ESMF and administrative assistance in recruiting and contracting expert safeguards services (as required), and monitor adherence of each project to the ESMF and WWF policies and procedures.

Lead Executing Entity (global PMU):

- Monitor implementation of this ESMF and compliance with national and international regulations, and WWF ESSF standards; including keeping track that all ESS requirements are effectively and timely met by the CTFs in Gabon and Namibia, and PEW including oversight for safeguards and the implementation of this ESMF.
- Collect grievances from the country/project-level GRMs in Gabon and Namibia, and report back to the WWF US GEF Agency
- Provide strategic guidance to implementation of the project, including oversight for safeguards and the implementation of this ESMF
- Provide any other coordination support to the CTFs and PEW (as the executing partner for the Eastern Tropical Pacific (ETP) portion of the PFP Project), as needed.

CTF (in this case, the Fund Administrator will function as a local project executing partner):

- Supervise and manage implementation of measures defined in this ESMF;
- Assign specific responsibilities for implementation of this ESMF, including monitoring, and community consultations on the draft management plan(s) to the responsible ESSF officer;
- Maintain relevant records associated with management of environmental and social risks, including updated ESSF screenings, impact assessments, evidence of consultations and FPIC, a log of grievances and any other together with documentation of management measures implemented;
- Report to the Implementing Partner, the Project Board on the implementation of the ESMF;
- Ensure that all service providers are informed of their responsibilities for the day to day compliance with the ESMF.
- Inform all the stakeholders and right-holders involved in, or potentially impacted, positively or negatively, by the GEF-financed projects, about the WWF's Policy on Accountability and Grievance Mechanism (described below);
- Establish and support the Grievance Mechanism to address any grievances;
- Ensure that the Compliance Review and the Stakeholder Response Mechanisms are operational during the lifetime of the projects;
- Ensure adherence to the ESSF for project activities implemented using funds channelled through WWF's accounts, and undertake appropriate measures to address any shortcomings;

- Verify and document that all WWF ESSF requirements have been addressed;

WWF Namibia: Depending on the institutional arrangements agreed for PFP implementation, the WWF Namibia Country Office might support the WWF GEF Agency in its fulfillment of duties. The exact scope of this Office’s role and responsibilities in implementation of the project will become clearer at the time of the “single close”, projected for December 2024.

8.4 Monitoring

Reporting on progress and issues in the ESMF implementation will be documented in the six-monthly Project Progress Reports (PPRs) and the annual Project Implementation Review (PIR) reports. The management plan(s) will specify their own monitoring and evaluation parameters. The WWF US GEF Agency ESS team will be ultimately responsible for overseeing compliance with the ESMF, as compiled in reports and submitted by the executing agency. The executing agency will be responsible for field level monitoring and disbursement of funding in line with the ESMF and IPPF and the potentially site and intervention specific management plan(s). Key issues will be presented to the respective Steering Committee/ Board during each meeting, as required.

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

A draft ESMF monitoring and evaluation plan is outlined below.

Table 10: Draft M & E plan

Monitoring Activity	Description	Frequency / Timeframe	Expected Action	Roles and Responsibilities	Cost to project
Track progress of ESMF implementation	Monitoring and reporting of ESMF implementation, with key results and issues presented to the Project Board on a regular basis	Quarterly, upon establishment of the CTF	ESMF requirements are completed for this Project	Project / Fund Manager	300,000 USD
Annual project quality assurance	The quality of the project will be assessed against WWF’s quality standards to identify project strengths and weaknesses and to inform management decision making to improve the project	Annual	Areas of strength and weakness will be reviewed and used to inform decisions to improve project performance, including adjustments to management plans and activities.	WWF-US GEF	TBD
Review and make course corrections	Internal review of data and evidence from all monitoring actions to inform decision making	Annual	Performance data, risks, lessons and quality will be discussed by the project steering committee and used to make course corrections	TNC and the Fund Manager	See M&E budget
Annual project implementation reports	As part of progress report to be presented to the Project Steering Committee and key stakeholders,	Annual	Updates on progress of ESMF and/or ESMP will be reported in the project’s annual Project Implementation Reports (PIRs) and biannual Project	Project / Fund Manager	See M&E budget

Monitoring Activity	Description	Frequency / Timeframe	Expected Action	Roles and Responsibilities	Cost to project
	analysis, updating and recommendations for risk management will be included		Progress Reports (PPRs). A summary of the avoidance and mitigation of potential social and environmental impacts will be included in the program annual report, sharing best practices and lessons learned across the program.		
Project review	The Project Steering Committee will consider updated analysis of risks and recommended risk mitigation measures at all meetings	Annual	Any risks and/ or impacts that are not adequately addressed by national mechanisms or project team will be discussed in project steering committee. Recommendations will be made, discussed and agreed upon.	Program Steering Committees/ Board, Project/ Fund Manager, WWF Namibia	See M&E budget

8.5 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 describes the community engagement during project preparation and implementation. This section is an overview, whereas the full details will be written out in the Stakeholder Engagement Plan.

Discussions with project stakeholders, including local communities at the 86 Community Conservancies, commenced during the overall WWF ESSF screening and included the GEF project's PPG phase. As such, while the screening was primarily intended for all relevant WWF operations in Namibia, this project was specifically mentioned. The Project Document has an annexed Stakeholder Engagement Plan (ProDoc Annex 7b), which will be followed to ensure that stakeholders are appropriately engaged both during the PFP development phase as well as during the sustainable financing mechanism phase. Particular attention is paid to the further assessment of environmental and social impacts and the development of appropriate management measures during the execution of the funding mechanism. The Stakeholder Engagement Plan will be updated during project implementation based on the assessments and management plans conducted in line with this ESMF, as needed.

Stakeholders will be engaged during the implementation of this ESMF, following FPIC requirements as needed.

As part of the stakeholder engagement process, WWF's ESSs require that project stakeholders have access to relevant information. Specifically, the ESSF standards on (1) Consultation and Disclosure, (2) Stakeholder Engagement, and (3) Grievance Mechanism provide details and will be adhered to during the implementation of this ESMF, and the subsequent implementation of the resulting management plans.

The ESMP and a template for future development of IPPs should be created within 1 (one) year of the selection of the Fund Administrator/CTF.

(a) Community engagement during Project Preparation and ESSF/IPPF Preparation

So far, consultations have taken place for the preparation of the overall PFP and specifically also for the preparation of the GEF 7 project. ESSF/IPPF related consultations have been carried out at the regular Community Conservancy forums and national level NACSO meetings.

Additional community-level ESSF/IPPF consultations are being pursued throughout the year by UNAM, with an anticipated final report in November 2023.

Table 11: Detailed community/stakeholder engagement during PFP development; the stakeholder engagement is ongoing until PFP closing in December 2024 and a SEP for the project implementation period has been developed.

Dates	Participants	General Concerns and Commentaries	How concerns were addressed
August 19, 2021	Director of Wildlife and National Parks, Ministry of Environment, Forestry and Tourism (MEFT); with WWF Namibia.	The Director confirmed MEFT involvement in the CBNRM Sustainability planning process since 2007, and appreciated the status update on the PFP since July 2021. He recommended that MEFT needs to be fully reengaged in the PFP development process. He highlighted the need to revisit the conservancy extension services, as conservancy support needs may have evolved as conservancies are maturing.	Agreement reached to use existing platforms to engage stakeholders, e.g. the National CBNRM Forum (when reactivated, post-COVID); MEFT Senior Management Team (incl. Executive Director (ED), Deputy ED, Directors of - Wildlife and National Parks, Forestry, Tourism, Scientific Services, Environmental Affairs; and Deputy Directors from six MEFT regions.
August 30, 2021	NACSO Executive Committee; with WWF Namibia.	PFP status update and overview shared with the NACSO Exco. They appreciated the engagement, and agreed to collaborate in organising the first broader PFP Stakeholders Meeting.	
October 8, 2021	Director of Wildlife and National Parks and Deputy Executive Director (MEFT); with WWF Namibia.	It is important to closely coordinate synergies between the PFP and related initiatives, e.g. GIZ funded project "Climate Change and Inclusive Use of Natural Resources" (CCIU). It is important to engage conservancies directly, and not only through the field-based supporting partners. Advised to conclude the CCFN Stakeholders consultancy before the proposed PFP Stakeholders briefing.	Patricia will participate in the planning of CCIU activities, i.e. CBNRM Stocktaking exercise; and National CBNRM Forum. Agreed to engage conservancies directly. Agreed to delay PFP Stakeholders briefing until after the CCFN Stakeholders Feedback meeting.
February 23-24, 2022	Zambezi Regional Conservancies Biannual Meeting - 98 participants from conservancies, traditional authorities, government, NGOs (including WWF), private sector, KAZA partners.	Appreciated update and one-pager brief on the PFP. They need time to discuss internally; and continue engaging in planning process.	PFP team members will continue attending conservancy meetings, at regional and individual conservancy levels, for continuous engagement.
March 2-3, 2022	Over 20 participants, incl. NACSO members, MEFT, CCFN, and WWF (5).	Participants agree with the proposed scope; assuming the socio-economic development component includes livelihoods. MEFT is onboard with the project, and will work closely with all partners to meet the commitments. Re question on specific commitments and obligations from government, it was indicated - Continued commitment to maintain and / or improve as needed by the rights holders, the existing legal framework; Maintain and / or improve existing support services to conservancies; make public statement in support of PFP. The GEF 7 project was briefly mentioned as a funding opportunity for the PFP, pending MEFT endorsement.	Partners will be engaged through serving on a reference group / sounding board to help oversee / guide the development of the socio-economic component. The Conservation Plan will be jointly developed with the partners, over multiple sessions on a weekly basis over at least two months or more if needs be.

March 3, 2022	Executive Director, MEFT, and GEF OFP; Director of Wildlife and National Parks; with WWF Namibia.	MEFT is supportive of the PFP, including GEF 7 project; and willing to sign endorsement letter when ready. MEFT is ready to participate fully in project development, not only signing endorsement letters.	A draft of the endorsement letter and the Enduring Earth Concept Note was sent to the ED / GEF OFP on March 16, 2022. The draft PIF will be shared with MEFT for their inputs as soon as it is ready.
March 14, 2022	Over 20 participants, incl. NACSO members, MEFT, WWF, and KAZA rep.	The partners convened a joint Environmental and Social Safeguards workshop to update each other on their different ESS processes, activities and plans. Partners agree to working towards a coordinating structure to help streamline ESS management amongst our different organisations. To update a broader reach of staff in our organisations on the need for and application of ESS management frameworks.	WWF will participate in the partners ESS coordination group.
March 17-20, 2022	Ombonde People's Park visit: WWF met with the Chairperson for Ehi Rovipuka Conservancy; Chairperson for Omatendeka Conservancy; IRDNC Kunene People's Park/Landscape Coordinator; IRDNC Assistant Director and IRDNC Executive Director.	Familiarization visit, thus general sharing of information including developments leading to decision by the two conservancies to jointly manage their exclusive wildlife zones through a People's Park to secure better protection.	
March 23, 2022	WWF with ED, MEFT, and GEF OFP; and Director of Wildlife and National Parks (MEFT).	Debriefing meeting after field visit; also discussed and agreed on collaboration to develop PFP, including endorsement letters to secure GEF 7 funding; and identified possible areas of support through GEF 8.	Maintain regular contact for information sharing and joint planning as needed.
March 23, 2022	WWF with Minister, MEFT and senior staff, including ED and some Directors.	Debriefing meeting after field visit; and general update on PFP; including request for high level political support.	
March 23, 2022	Multidimensional Poverty Dialogue involving over 20 participants incl. MEFT, NPC, NGOs, UNAM, Media rep.	The discussion focused on the Role of Community-Based Conservation in supporting the nation to address multi-dimensional poverty. Panelists included the Director of Policy, Planning and Research, MGEPEW, Chairperson of NACSO (and Director, Namibia Development Trust) and WWF Programme Director for the PFP Initiative.	
March 31-April 8, 2022	Online exchange involving over 40 participants from CBNRM stakeholders to select name for PFP	After considering at least five different name options, the vast majority of participants agreed to Namibia for Life – where "for life" signifies for people, for wildlife, and forever (as in, "set for life").	
May 16, 2022	Extension Services Plan kick-off meeting with 28 participants incl NACSO members, MEFT and CCFN	Main purpose was to share an overview of PFP approach; status update of Namibia for Life (N4L); an overview of existing extension services; an overview of PFP Conservation Plan & examples; explore integrating climate adaptation considerations in PFP Conservation Plan.	Participants agreed that there is a need to review the existing extension services; and involving conservancies directly in such revisions.
May 18, 2022	ESS mitigation planning training by WWF US ESS team for over 20	The training covered an overview of environmental & social safeguards	

	participants incl NACSO members and MEFT	standards; key elements of ESSF risk mitigation; guiding principles for the ESMF; and guidance on interpreting the categorization memo and completing various tables and forms relating to environmental and social risks.	
June – September, 2022	Several planning sessions with a core team of 10 people representing NGOs and MEFT to prepare for the in-person Extension Services Workshop in September 2022.	The group agreed to propose adoption of the existing National CBNRM Vision as the Vision for the PFP; drafted a PFP goal and a goal for the Extension Services Plan; agreed to propose the draft components of the PFP; drafted an area-based disbursement condition; drafted a purpose and agenda for the in-person workshop; and provided guidance on logistics.	
July 20-21, 2022	Zambezi Biannual Meeting attended by over 100 participants from 16 registered and 4 emerging conservancies; and Traditional Authorities in Zambezi; 2 visiting conservancies from Kavango East; community and support entity reps from Angola, Botswana and Zambia. MEFT; IRDNC, NNF, WWF, BFS, Kwando Carnivore Project.	Following PFP status update, and distribution of update hand-outs, Business Financial Solutions (BFS) introduced the SED assessment and distributed questionnaires for completion. The participants appreciated and welcomed the focus on enterprise development; and advised that assessment questionnaires be administered through IRDNC and NNF to reach as many people as possible.	BFS welcomed assistance from IRDNC and NNF; but wished that conservancy leaders present can also guide the enumerators on who to interview.
August 5, 2022	WWF Namibia meeting with NPC ED, Chief Development Advisor, Development Partners Coordination, and Head of Multilateral Programmes, under Development Cooperation.	Following PFP update and distribution of update hand-outs, NPC ED and staff inquired about the in-country commitment or government role in this initiative? Further query: Considering the Green Hydrogen Vision of Namibia, which articulates the country's future development aspirations, how will the PFP reconcile the needs of conservation and development? Under the green hydrogen initiative, the NPC is co-facilitating (with Hyphen) the development of socio-economic development plans for all regions. It will be important to seek synergies between these and what is being developed under the SED component of N4L.	It was clarified that the MEFT is the parent ministry for all the work in support of conservancies. This question is also relevant to the prospective donors to the initiative, so need to document government overall support and contribution to the establishment and development of conservancies. It was clarified that the needs of conservation and development are not mutually exclusive, but rather interdependent. Green energy developments are complementary to, and thus ought to be pursued as part of the broader conservation and green growth agenda of the country. In this respect, WWF commissioned an energy assessment report to broaden our own knowledge and understanding of the green energy agenda (both globally and locally) and inform discussions on the topic. The NPC agreed to host a roundtable of relevant government line ministries and stakeholders of N4L as and when requested to do so.
August 31, 2022	Kavango East and West Conservancies update on N4L and SEDA	The update was very brief; online – during their Green Economy Vision workshop; thus, need for follow-up.	
Sept 1, 2022	WWF Namibia meeting with KfW	Shared PFP update and distributed update hand-outs; briefing of new Country Rep Ms Beatrice Luke & Antje Steffen	
Sept 5-7, 2022	WWF and BFS met with Ombonde People's Landscape Board and IRDNC Kunene staff.	Following PFP update and distribution of update hand-outs; and in response to the point about conservancies needing to	In explaining some of the proposed funds disbursement conditions, it was highlighted that it is important for all

		<p>make a permanent commitment towards conservation, i.e., area under conservancy management, it was highlighted that it's important to engage Ministry of Mines and Energy to better understand potential impact of Exclusive Prospecting Licences (EPLs) on conservancies and alleviate / mitigate potential negative impacts as identified.</p> <p>A question was raised on how conservancy commitment to the initiative will be "documented", in a similar manner that funding partner commitment will be documented? Who / how will conservancies become "signatory" to the Deal? This question still needs to be explored for clear answer.</p> <p>BFS introduced the SEDA and distributed questionnaires.</p>	<p>conservancies to comply with the SOPs, because if compliance with SOPs is agreed to as a funds disbursement condition, the disbursement of funding every year to fund extension services will only happen if the required number of conservancies comply with the SOPs.</p> <p>It was indicated that the initiative seeks to support all conservancies registered by the end of PFP planning window, i.e., 2024.</p>
Sept 26-29, 2022	National Extension Services Plan WS involved over 70 participants from conservancies, government, NGOs, (the latter two including a mix of national and regional / field level staff).	Agreed on a vision statement and goal for the Extension Services Plan; area-based disbursement condition and draft detailed written descriptions of each activity / extension service and how it supports the Extension Services Plan goal.	
Oct 12, 2022	N4L update at North Central community Conservation landscape Peer review, Learning and sharing Workshop	The update was online, with limited interaction; thus, need for follow-up.	
Oct 2022	US donor briefings		
Nov 10, 2022	WWF Namibia meeting with KfW, including CCFN review team from Germany.		
Dec 5-9	NACSO WGs Coordination and Annual Planning Week attended by 40 representatives from MEFT, NACSO partners, and Projects, to provide progress updates/feedback on 2022 activities by the regional field-based staff and working groups; and develop a common work plan for supporting Governance, NRM, and Enterprises. Work session on GEF ESFM, IPP and Gender Plan	Working group sessions provided inputs into the ESFM, IPPF and Gender Action Plan. Working group inputs were captured and included into the write ups.	No specific concerns. Meeting minutes and working group transcripts available.
Jan 23-27, 2023	Kunene Biannual Meeting attended by over 50 participants from conservancies; Traditional Authorities; and technical support staff from NGOs and government.	Following PFP status update, and distribution of update hand-outs, UNAM introduced the ESSF. The NILALEG project (UNDP/GEF funded and implemented by EIF) as shared by participants offers great potential for dovetailing with the SED component of N4L, as it has been supporting household food security including livestock farming, water provision, provision of hammer mill, poultry production, and solar energy installations at tourism enterprises. Participants proposed considering developing a Grievance Redress Mechanism for all conservancies in the	PFP team members will continue attending conservancy meetings, at regional and individual conservancy levels, for continuous engagement.

		region, i.e. under Kunene Regional Conservancies Association.	
Feb 15-17, 2023	Zambezi Biannual Meeting was attended by over 100 participants from 16 registered and 5 emerging conservancies; 4 community forests and Traditional Authorities in Zambezi; Gondwana Collection (tourism operator); community and support entity reps from Angola, Botswana and Zambia. MEFT; IRDNC, NNF, WWF, UNAM, Kwando Carnivore Project and NCE (Namibian Chamber of the Environment).	Following PFP status update, and distribution of update hand-outs, UNAM introduced the ESSF. The restructuring of IRDNC to reduce their number of staff in both Kunene and Zambezi regions is in direct response to shortages in funding for conservancy extension services, thus highlighting the need for N4L, in particular the Endowment Fund to support conservancy extension services in perpetuity.	PFP team members will continue attending conservancy meetings, at regional and individual conservancy levels, for continuous engagement.
Feb 15 & 16, 2023	Nacso Head of Organizations meeting & special work session with WWF. Update on GEF 7 project proposal development.	No specific concerns. Updates received and review plan agreed to.	Updates will be shared as they become available. It was decided that the full proposal document be shared with all annexes for a consolidated review.
Mar 29 & 30, 2023	Nacso Head of Organizations meeting & AGM	Presentation on ProDoc development, ESFM & IPPF delivered. No specific comments at that time, however, worry about the review timeline, which has been moving.	Will share full ProDoc with annexes for review as they become available.
May 30 & 31, 2023	Conservation Plan review meeting	Confirmation of extension services as part of conservation plan	Meeting report; reviewed and updated conservation plan
Jun 15, 2023	Validation workshop	Inclusion of Community Forests and Community Fisheries reserves in PFP? What is the role of the CCFN?	Meeting minutes

(b) Community engagement during project implementation

Community Conservancies are the primary beneficiaries from the Extension Support Services funded by the Endowment Fund. Individual Conservancies will request the services and service providers to assist in compliance management. Further details on how this process will unfold, including timelines, selection criteria and conditions for disbursement of grants, will be developed as part of the PFP preparation process and form part of the Operation Manual that will be developed before the “Closing Deal” is signed off in December 2024.

Considering that this is a crucial safeguards requirement, such decision-making process to determine how the funding will be distributed needs to be agreed on and operationalized before any disbursements to service providers/conservancies can commence.

Please note that the SEP further specifies the community engagement, which is guided by the existing national CBNRM policy and legal framework.

8.6 Guidance for SEAH Risk Mitigation

According to the results of the screening provided in Annex IV of this ESMF, 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 GAAP and updated procedures for SEAH-specific grievances outlined below and in line with the national law.

This should 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 project/ fund manager in reviewing any identified risks and mitigation measures to ensure that all staff understand their responsibilities and the responsibilities of EEs, project partners, contractors, and any other entities who will receive GEF funding for this project.
- Development of a communication mechanism between the local project partners and the designated staff member responsible for HR and/or Safeguards (including Gender and SEAH) 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 implementing 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 designated staff member responsible for HR and/or Safeguards (including Gender and SEAH) and should include:
 - Training within the first 3 months of project implementation that have been prepared with oversight and final approval from the WWF GEF AE Safeguards and Gender Leads.
 - Be mandatory for all implementing partner staff who will be involved in the GEF-financed activities.
- Strengthen the Community Conservancies 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 implementing partners will receive.
- Strengthen the capacities of the entities/ stakeholders 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 implementing partners will receive.

8.7 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 relevant vernacular languages, either through on-site translation, recorded messages or written materials,³² and made available along with the ESMF and SEP on the websites of the fund executing agency/CTF as well as the websites of the WWF GEF Agency. Hard copies of the ESMF will be placed in appropriate public locations and at the fund executing agency. Project Managers and the staff responsible for HR and/or Safeguards at the fund executing agency 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.

³² Namibia's official language is English and Afrikaans, German, Otjiherero, Khoekhoegowab, Oshiwambo, RuKwangali, Setswana, siLozi, Ju/'hoansi, Gciriku and Thimbukushu are recognised.

WWF Namibia has commissioned UNAM to undertake community level outreach on the ESMF and IPPF already and relevant community engagement is ongoing throughout 2023. Relevant materials are translated into vernacular language as appropriate.

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 fund executing agency (in consultation with the GSC, the WWF GEF Agency and WWF Namibia) and in advance of their public disclosure. The CTF 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 the websites of the CTF and WWF.

The disclosure requirements are summarized in Table 12 below.

Table 12: 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 the fund executing agency and WWF. Copies should be available at the fund executing agency's office and NACSO.
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 the fund executing agency and WWF. Copies should be available at NACSO.
Safeguards quarterly Progress Report	Quarterly	Copies should be available the fund executing agency's office, and at NACSO..
Minutes of Formal Public Consultation Meetings	Within two weeks of meeting	On the website of the fund executing agency and WWF. Copies should be available at the fund executing agency's office and at NACSO
Grievance redress process	Annually, throughout the project cycle	On the website of the fund executing entity. Copies should be available at the executing agency's office.

9 Accountability and Grievance Mechanism

Overall, under the Enduring Earth GEF-7 Project, there will be four Grievance Redress Mechanisms (GRM) available to those impacted by the project, which should be accessed in the following order depending on the type of grievance being raised: 1st country/project-level (Gabon PFP and Namibia PFP), 2nd project-wide (TNC PMU-level), 3rd WWF US, and 4th the GEF Secretariat mechanism.

1. Project-level Grievance Redress Mechanism

The project will have a direct and tangible effect on local communities and individuals residing within or in the vicinity of project sites in 86 Community Conservancies throughout Namibia. There is thus a need for an efficient and effective Grievance Redress Mechanism (GRM) that collects and responds to stakeholders' inquiries, suggestions, concerns, and complaints. This section describes the details of the GRM, including details on the process to submit a grievance, how long the CTF will have to respond, and who on the CTF will be responsible for its implementation and reporting.

Until a Fund Administrator is established, the GRM of the WWF Namibia office (included in ANNEX 1) will be applicable to this project. However, within the first six months after the establishment of the CTF, said Fund Administrator will establish a project/country-level GRM.

The GRM operates 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 not be limited to, the following issues:

- i. Allegations of fraud, malpractices or corruption by staff or other stakeholders as part of any project or activity financed or implemented by the project, including allegations of gender-based violence or sexual exploitation, abuse, or harassment;
- ii. Environmental and/or social damages/harms caused by projects financed or implemented (including those in progress) by the project;
- iii. Complaints and grievances by permanent or temporary workers engaged in project activities.

Complaints could relate to pollution prevention and resource efficiency; negative impacts on public health, environment or culture; destruction of natural habitats; disproportionate impact on marginalized and vulnerable groups; discrimination or physical or sexual harassment; violation of applicable laws and regulations; destruction of physical and cultural heritage; or any other issues which adversely impact communities or individuals in project areas. The grievance redress mechanism will be implemented in a culturally sensitive manner and facilitate access to vulnerable populations. Special training can be provided to ensure capacity to address SEAH-related grievances in a culturally sensitive and victim-centered way.

1. *Disseminating information about the GRM*: It is essential that community members understand and have confidence in the grievance mechanism, which is why materials describing the GRM will be made publicly available early on, both digitally on the websites of the CTF, TNC and WWF, and in physical form as part of the project stakeholder engagement activities. Through this, the process of lodging and handling grievances will be made clear to all project participants, especially what constitutes a grievance, right to raise grievances, methods for raising grievances, how complaints are handled and responded too and timeframes
2. *Submitting complaints*: Project affected people, workers, or interested stakeholders can submit grievances, complaints, questions, or suggestions in verbal or written form, via email, mail, phone call or in person. The appropriate addresses and phone numbers will be identified after the CTF has been established (within the first 6 months of its operation).
3. *Processing complaints*: All grievances submitted to the CTF shall be registered and considered, and a tracking registration number should be provided to all complaints. The CTF

shall determine the best way to categorize or otherwise sort complaints received, such as based on their nature, the specific matter to which they refer, etc.

4. Acknowledging the receipt of complaints: Once a grievance is submitted, the designated official or the Safeguards Specialist at the CTF shall acknowledge its receipt, brief the complainant on the grievance resolution process, provide the contact details of the person in charge of handling the grievance (which should be said Safeguards Specialist at the CTF), and provide a registration number that would enable the complainant to track the status of the complaint.
5. Investigating complaints: The Safeguards Specialist at the CTF will gather all relevant information, conduct field visits as necessary and communicate with all relevant stakeholders as part of the complaint investigation process. The CTF should ensure that the investigators are neutral and do not have any stake in the outcome of the investigation.
6. Responding to complainants: A summary of the complaint raised, actions taken, conclusions reached, follow-up plan and timeframe for completion will be written and communicated to the complainant within 15 working days. If further investigation is required, the complainant will be informed accordingly and a final response will be provided after an additional period of 15 working days. Grievances that cannot be resolved by grievance receiving authorities/office at their level should be referred to a higher level for verification and further investigation.
7. Appeal: In the event that the parties are unsatisfied with the response provided by the GRM, they will be able to submit an appeal to CTF within 10 days from the date of decision. In the event that the parties are unsatisfied with the decision of the appeal committee, the parties can submit their grievances directly to TNC, the GEF Agency or the Court of Law for further adjudication.
8. Monitoring and evaluation: The Safeguards Specialist at the PMU will compile a quarterly report with full information on the grievances they received. The report shall contain a description of the grievances and their investigation status. Summarized GRM reports shall constitute part of the regular project progress reporting, and shall be submitted to the PSC and WWF GEF Agency. These reports should also be available on the websites of TNC and WWF GEF Agency.

The GRM seeks to 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 the Republic of Namibia.

Until the project-level GRM is established, a complainant can submit a grievance to WWF Namibia Grievance Mechanism, reachable at the Country Office website at www.wfnamibia.org (Annex 1 includes the details of this GRM).

Those able to access and communicate with national grievance mechanisms have established options in Namibia. These include the Office Ombudsman, which promotes and protects human rights of all Namibians. The office can be reached at:

Office of the Ombudsman
Corner of Feld and Lossen Streets
Private Bag 13211, Windhoek
Tel 061-2073111 (All sections)
Fax 061-220550 (Ombudsman)

Email: office@ombudsman.org.na
Fax 061-226838 (Director and Investigations)

Other grievance mechanisms that stakeholders can access – for example in relation to land rights and/or land related disputes, stakeholders can approach the regional Communal Land Boards in their respective regions. In all the regions, the Communal Land Boards are housed in the regional offices of the Ministry of Land Reform. Similarly, in each region there are Community Courts, which stakeholders can approach for recourse of their grievances. For the needs of the indigenous and marginalised communities in particular, the stakeholders can approach the Office of the Vice President of the Namibia under the Office of Veterans Affairs, Disability Affairs and Marginalized Communities. The contact details are:

Division Marginalised Communities

Deputy Minister: Marginalised Communities Hon. Royal /Ui/o/oo

Office of the Vice President

Robert Mugabe Avenue

Private Bag 13407

Tel: +264 61 296 3110

Fax: +264 61 305 935

The Office of the Regional Councils in the respective regions are other grievance mechanisms that stakeholders can approach. It should be noted that these established options do not replace the need for accessible local and project grievance mechanisms within the Project.

2. TNC PFP-wide Grievance Mechanism

After the project/country-level GRM, the next GRM available to complainants is the one established by TNC, as global PMU, which is applicable to all the PFP geographies under this project. It will operate as follows:

1. Disseminating information about the GRM: All materials describing the GRM, once approved by the PMU and cleared by WWF US, will be made publicly available through posting them on the WWF/TNC websites and disseminated as part of the Project stakeholder engagement activities. The GRM will be communicated with all communities and stakeholders by the Monitoring and Evaluation (M&E) Officer, whose responsibilities include safeguards duties, and who will also develop GRM materials (brochure, flyers, etc.). Materials will include basic information on GRM and contact information on all grievance uptake locations, including:
 1. Name of location/channel to receive grievance.
 2. Address of location.
 3. Responsible person.
 4. Telephone(s).
 5. Email.
 6. Days and hours for receiving verbal grievances.

The materials will also include a summary of the process for registering, reviewing and responding to grievances including the estimated response time. The information about the GRM will also be presented as a chart to make it easy for people to view. The materials will be produced in the following languages:

PFP	Languages
Gabon	English, French
Namibia	English
Eastern Tropical Pacific PFP	English, Spanish

2. Submitting complaints: Project affected people, workers, or interested stakeholders can submit grievances, complaints, questions, or suggestions to the TNC PMU through a variety of communication channels, including phone, regular mail, email, text messaging/SMS, or in-person.
3. Processing complaints: All grievances submitted to the TNC PMU shall be registered and considered. A tracking registration number should be provided to all complainants. To facilitate investigation, complaints will be categorized into four types: (a) comments, suggestions, or queries; (b) complaints relating to nonperformance of project obligations and safeguards-related complaints; (c) complaints referring to violations of law and/or corruption while implementing project activities; (d) complaints against authorities, officials or community members involved in the project management; and (e) any complaints/issues not falling in the above categories.
4. Acknowledging the receipt of complaints: Once a grievance is submitted, the M&E Officer at the TNC PMU shall acknowledge its receipt, brief the complainant on the grievance resolution process, provide

the contact details of the person in charge of handling the grievance (which should be said M&E officer), and provide a registration number that would enable the complainant to track the status of the complaint. Please note that, although the personal identifiable information of the grievant should remain confidential to the M&E Officer in all cases, this anonymity should be furthered maintained by the M&E Officer if the complainant does not want to file a grievance with their identifying information.

5. Investigating complaints: The M&E Officer at the PMU will gather all relevant information, conduct field visits as necessary, and communicate with all relevant stakeholders as part of the complaint investigation process. The PMU should ensure that the investigators are neutral and do not have any stake in the outcome of the investigation.
6. Responding to complainants: A written response to all grievances will be provided to the complainant within 15 working days. If further investigation is required, the complainant will be informed accordingly and a final response will be provided after an additional period of 15 working days. Grievances that cannot be resolved by grievance receiving authorities/office at their level should be referred to a higher level for verification and further investigation
7. Appeal: In the event that the parties are unsatisfied with the response provided by the GRM, they will be able to submit an appeal to TNC within 10 days from the date of decision. In the event that the parties are unsatisfied with the decision of the appeal committee, the parties can submit their grievances directly to the GEF Agency or the Court of Law for further adjudication.
8. Monitoring and evaluation: The M&E Officer at the PMU will compile a quarterly report with full information on the grievances they received across all PFPs. The report shall contain a description of the grievances and their investigation status. Summarized GRM reports shall constitute part of the regular project progress reporting, and shall be submitted to the PSC and WWF GEF Agency. These reports should also be available on the websites of TNC and WWF GEF Agency.

3. WWF GEF Agency GRM

Next, a complainant can also 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

Stakeholder may also submit a complaint online through an independent third-party platform (Ethics point) at <https://secure.ethicspoint.com/domain/media/en/gui/59041/index.html>

4. GEF Conflict Resolution Commissioner

In addition to the country-level, PFP-wide and WWF GEF Agency GRMs, a person concerned about a GEF-financed project or operation may submit a complaint to the GEF Resolution Commissioner, who plays a facilitation role and reports directly to the GEF CEO. The Commissioner can be reached at:

E-mail: plallas@thegef.org

Mailing Address:

Mr. Peter Lallas
Global Environment Facility
The World Bank Group, MSN N8-800
1818 H Street, NW
Washington, DC 20433-002

Complaints submitted to the Commissioner should be in writing and can be in any language. The complaints should provide at least a general description of the nature of the concerns, the type of harm that may result, and (where relevant) the GEF-funded projects or program at issue.

10. Budget

The ESMF implementation costs, including all costs related to compensation to project affected people, will be covered from the project budget up to 300,000 USD. It will be the responsibility of the 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 Safeguards Specialist will be employed and 100% of their time will be dedicated to ensuring the ESMF implementation. The project manager at the Fund administrator will oversee the ESMF implementation.

Budget for capacity building on ESMF/IPPF 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 3 of the project.

Annex I: WWF Namibia Grievance Process

See Grievance mechanism @ www.wwfnamibia.org

BACKGROUND

This Grievance process document covers WWF Namibia's in-country work, particularly for our two major programme areas – Community Based Natural Resource Management (CBNRM) and Wildlife Crime. In both programmes, WWF works primarily through implementing partners (i.e., providing grants and / or technical advice to partners who render technical support services). Our technical support to our partners reaches 86 conservancies to varying degrees, across the country, including 42 in the northwest part of the country and 21 in the northeast part of the country. The Wildlife Crime programme also works at both the national level and at the field level and is also aimed at strengthening institutional capacity and coordination among all stakeholders contributing to wildlife crime prevention.

WWF has been operational in the Namibia landscape since 1993 and because our focus has been on CBNRM, we have a long, well entrenched partnership engagement process that promotes community empowerment and trust. Over the years we have shown strong empathy with communities, sensitive to their needs, aware of the importance of open, transparent communication, and facilitating their ability to secure rights and opportunities in the conservation arena across the Namibian landscape. Ensuring the programme's continuing success will therefore require the careful management of an array of concerns, interests, priorities, and expectations.

In line with best practice, WWF Namibia has developed this grievance mechanism to ensure that members of communities affected by our project(s) activities within country are able to freely channel their concerns, issues or claims through a complaint process. WWF Namibia works within the limits of the Namibian government national legislation. Furthermore, WWF Namibia is legally associated with WWF-US and operates under a Memorandum of Understanding with the Ministry of Environment Forestry and Tourism.

Any person or group^[1] who is affected by project activities has a right to raise a grievance and the project proponent has the responsibility to respond within a reasonable time period. In practice, the processes and structures of any grievance mechanism will form part of an ongoing community engagement strategy, with regular communication and feedback between project staff and community members^[2].

Box 1. Definitions used

A *grievance* is an issue, concern, problem, or claim (perceived or actual) that an individual or community group wants relevant duty bearers to address and resolve.

Grievance Focal Point is a dedicate staff member at WWF Namibia office designated to manage the grievance mechanism.

Grievant refers to a person who submits a grievance for resolution through a grievance procedure and especially for arbitration.

A *programme-level grievance mechanism* is a process for programme proponents to receive, review and address affected communities' and individual concerns and complaints arising from the implementation of project activities.

Guiding Principles

The development of the grievance mechanism is based upon a set of principles (see Box 2) and will be reviewed

and updated in consultation with stakeholders. It is essential that community members understand and have confidence in the grievance mechanism.

WWF takes all grievances seriously and is committed to providing responses and resolving all grievances and conflicts in a timely manner. More complex grievances may require more time to resolve, but the process will be initiated and the steps to be taken will be communicated to the grievant.

Preventative mechanisms for avoiding the incidence of grievances arising in the first place, or addressing them in real time at the lowest level, are a key component in the learning and adapting part of the programme. This includes, for example, continuous dialogue and periodic meetings with stakeholders at all levels of engagement (from elected government representatives, local communities, local authorities, and partner organisations). Such meetings aim to facilitate communication, ensure consultation and transparency, and reduce the potential for misunderstanding and grievances.

Box 2. Guiding principles for the handling of grievances

The following guiding principles apply:

Trust

Grievances will be acknowledged and handled in a prompt and efficient manner.
Confidentiality related to the grievant will be maintained.

Transparency

The process of lodging and handling grievances will be made clear to all project participants, especially what constitutes a grievance, right to raise grievances, methods for raising grievances, how complaints are handled and responded too and timeframes.

Accessibility

Verbal, written and anonymous complaints will be accepted via phone call, written message or in person. Available to all stakeholders regardless of location within the programme area, language, socioeconomic position, gender, age, and literacy level.

Fairness and impartiality

Grievances will be treated respectfully whether it is felt the complaint is justified or not.
Grievances will be treated in an objective manner, with both process and outcomes considered equally important.

Accountability

A grievance will be handled by the WWF Namibia office designate responsible for the activity (inclusive of transboundary activities) in question.
A grievance against WWF Namibia, should be understood as against WWF as an organisation and thus addressed in a collective and coordinated manner.

Continuous learning

Lessons learned and how addressed will be shared to improve WWF's accountability and responsibility for its actions.

STANDARD OPERATING PROCEDURE

1. Eligibility: Who can make a complaint?

Any community, group, or person who believes it is or may be negatively affected by WWF Namibia's failure to follow its Social Policies and Safeguards in the design or implementation of a WWF Namibia project activity that is implemented by WWF Namibia or one of its partners is considered an "Affected Party". Any Affected Party may file a complaint. Representatives filing a complaint on behalf of an Affected Party must provide concrete evidence of authority to represent them.

Given that this project complaints resolution process is oriented towards direct dialogue and engagement among all parties in the spirit of joint resolution of grievances, anonymous complaints are discouraged, though confidentiality will be upheld as agreed. There is a risk that confidentiality may limit efforts to resolve complaints, and complainants will be informed if confidentiality is impeding the process.

2. WWF Network's Environmental and Social Safeguards and Policies

3. Lodging a grievance that is related to WWF Namibia project activities

Grievances against activities undertaken in Namibia can be lodged through the following channels:

- Grievance Focal Point, WWF Namibia, 19 Lossen St, PO Box 9681, Ausspanplatz, Windhoek, Namibia.
- Tel: +264 61 389 400.
- Email: complaint@wwf.na
- Websites:
 - www.wwfnamibia.org
 - <https://wwfus.ethicspoint.com>

4. Grievance Filing Process

Each grievance lodged should include, to the best extent possible, the following information:

- Complainant's name and contact information.
- If not filed directly by the complainant, proof that those representing the affected people have authority to do so.
- The specific project or program of concern including the location.
- The harm that is or may be resulting from the complaint.
- The relevant WWF social policy provision (if known).
- Any other relevant information or documents (e.g., date of event).
- Any actions taken so far (if any) to resolve the problem, including contact with WWF.
- Proposed solution.
- Whether confidentiality is requested (stating the reason).

5. Grievance Review Process

Step 1. The WWF Namibia Project Complaints Team will assess the eligibility of the complaint and provide a response as to whether or not it is eligible, in accordance with the above requested information (10 business days after receiving the complaint).

Step 2.1. If the complaint is eligible, the Project Complaints Team will come up with a plan and define a timeframe to investigate the complaint. The team will then communicate this information to the Affected Party (10 business days after Step 1 is finalized).

Step 2.2. If the complaint is not eligible but does raise concerns, then the Project Complaint Team will refer the complaint to the right staff member or third party to follow up.

Step 3. The team will then investigate the matter, with additional technical support as needed, including support from the field partners. Based on the results, the team will then work with the affected parties to develop and implement an action plan and timeframe of steps required to resolve any issues identified.

Step 4. A summary of the complaint raised, actions taken, conclusions reached, follow up plan and timeframe for completion will be documented and communicated as agreed between the parties. WWF will facilitate support to further clarify, assess, and resolve issues raised as needed including, if appropriate, engaging input from outside experts.

The Grievance log and copies of all files and communications will be maintained by the WWF Namibia Grievance Focal Point. All grievances will be logged, acknowledged, handled, and closed as standard procedure.

6. Handling and resolving a grievance

The Grievance Focal Point will be responsible for handling and resolving grievances, with the support from members of the WWF Namibia Complaint Team and the respective Programme/Project Leader.

7. WWF Namibia Project Complaints Team Members

- i. Director, CBNRM Governance Programme
- ii. Director, CBNRM and Business Programme
- iii. Director, Wildlife Programme
- iv. KAZA Programme Lead
- v. ESSF Coordinator

8. Non-Retaliation

WWF Namibia strongly disapproves of and will not tolerate any form of retaliation against those who report complaints in good faith. Any WWF Namibia employee who engages in such retaliation will be subject to disciplinary action up to and including termination of employment. WWF Namibia will take all feasible actions to protect complainants against retaliation. Anyone who has made a report of suspicious conduct of a WWF Namibia employee and who subsequently believes he or she has been subjected to retaliation of any kind should immediately report it by the same channels as noted herein.

[1] A group is considered to be 2 or more people, or could be an individual who is duly authorised by a group to act on their behalf. An individual could also be acting on his own behalf and interests.

[2] Fauna & Flora International (2014). Grievance Mechanisms. Lessons Learned from REDD+ and other conservation strategies. UK.

Annex II: Indicative Outline of an ESMP (sample)

An ESMP may be prepared as part of the Environmental and Social Impact Assessment (ESIA) or as a stand-alone document.³³ The content of the ESMP should address the following sections:

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

(2) Monitoring: Identifies monitoring objectives and specifies the type of monitoring, with linkages to the impacts assessed in the environmental and social assessment and the mitigation measures described in the ESMP. Specifically, the monitoring section of the ESMP provides (a) a specific description, and technical details, of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions; and (b) monitoring and reporting procedures to (i) ensure early detection of conditions that necessitate particular mitigation measures, and (ii) furnish information on the progress and results of mitigation.

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

(4) Stakeholder Engagement: Outlines plan to engage in meaningful, effective and informed consultations with affected stakeholders. Includes information on (a) means used to inform and involve affected people in the assessment process; (b) summary of stakeholder engagement plan for meaningful, effective consultations during project implementation, including identification of milestones for consultations, information disclosure, and periodic reporting on progress on project implementation; and (c) description of effective processes for receiving and addressing stakeholder concerns and grievances regarding the project's social and environmental performance.

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

³³ This may be particularly relevant where contractors are being engaged to carry out the project, or parts thereof, and the ESMP sets out the requirements to be followed by contractors. In this case the ESMP should be incorporated as part of the contract with the contractor, together with appropriate monitoring and enforcement provisions.

Annex III: Indicative Outline of an Indigenous People's Plan (sample)

This outline guides the preparation of an Indigenous Peoples Plan, although not necessarily in the order shown.

Executive Summary of the Indigenous Peoples Plan

This section concisely describes the critical facts, significant findings, and recommended actions.

Project Description

This section provides a general description of the project; discusses project components and activities that may bring impacts on Indigenous Peoples/Ethnic Minorities; and identify project area.

Social Impact Assessment

This section:

- a. Reviews the legal and institutional framework applicable to Indigenous Peoples/Ethnic Minorities in project context;
- b. Provides baseline information on the demographic, social, cultural, and political characteristics of the affected Indigenous Peoples/Ethnic Minorities; the land and territories that they have traditionally owned or customarily used or occupied; and the natural resources on which they depend;
- c. Identifies key project stakeholders and elaborate a culturally appropriate and gender-sensitive process for meaningful consultation with Indigenous Peoples/Ethnic Minorities at each stage of project preparation and implementation, taking the review and baseline information into account;
- d. Assesses, based on meaningful consultation with the affected Indigenous Peoples/Ethnic Minority communities, and the potential adverse and positive effects of the project. Critical to the determination of potential adverse impacts is a gender-sensitive analysis of the relative vulnerability of, and risks to, the affected Indigenous Peoples/Ethnic Minority communities given their particular circumstances and close ties to land and natural resources, as well as their lack of access to opportunities relative to those available to other social groups in the communities, regions, or national societies in which they live;
- e. Includes a gender-sensitive assessment of the affected Indigenous Peoples/Ethnic Minorities' perceptions about the project and its impact on their social, economic, and cultural status; and
- f. Identifies and recommends, based on meaningful consultation with the affected Indigenous Peoples/Ethnic Minorities communities, the measures necessary to avoid adverse effects or, if such measures are not possible, identifies measures to minimize, mitigate, and/or compensate for such effects and to ensure that Indigenous Peoples/Ethnic Minorities receive culturally appropriate benefits under the project.

Information Disclosure, Consultation and Participation

This section:

- a. Describes the information disclosure, consultation and participation process with the affected Indigenous Peoples/Ethnic Minority communities that can be carried out during project preparation;
- b. Summarizes their comments on the results of the social impact assessment and identifies concerns raised during consultation and how these have been addressed in project design;
- c. In the case of project activities requiring broad community support, documents the process and outcome of consultations with affected Indigenous Peoples/Ethnic Minority communities and any agreement resulting from such consultations for the project activities and safeguard measures addressing the impacts of such activities;
- d. describes consultation and participation mechanisms to be used during implementation to ensure Indigenous Peoples/Ethnic Minorities participation during implementation; and
- e. Confirms disclosure of the draft and final to the affected Indigenous Peoples/Ethnic Minority communities.

Beneficial Measures

This section specifies the measures to ensure that Indigenous Peoples/Ethnic Minorities receive social and economic benefits that are culturally appropriate, and gender responsive.

Mitigative Measures

This section specifies the measures to avoid adverse impacts on Indigenous Peoples/Ethnic Minorities; and where the avoidance is impossible, specifies the measures to minimize, mitigate and compensate for identified unavoidable adverse impacts for each affected Indigenous Peoples/Ethnic Minorities.

Capacity Building

This section provides measures to strengthen the social, legal, and technical capabilities of (a) government institutions to address Indigenous Peoples/Ethnic Minorities issues in the project area; and (b) Indigenous Peoples/Ethnic Minority organizations in the project area to enable them to represent the affected Indigenous Peoples/Ethnic Minorities more effectively.

Grievance Redress Mechanism

This section describes the procedures to redress grievances by affected Indigenous Peoples/Ethnic Minority communities. It also explains how the procedures are accessible to Indigenous Peoples/Ethnic Minorities and culturally appropriate and gender sensitive. It is anticipated this would utilize the already developed Grievance Redress Mechanism established under the Indigenous Peoples Planning Framework.

Monitoring, Reporting and Evaluation

This section describes the mechanisms and benchmarks appropriate to the project for monitoring and evaluating the implementation of the Indigenous Peoples Plan. It also specifies arrangements for participation of affected Indigenous Peoples/Ethnic Minorities in the preparation and validation of monitoring, and evaluation reports.

Institutional Arrangement

This section describes institutional arrangement responsibilities and mechanisms for carrying out the various measures of the Indigenous Peoples Plan. It also describes the process of including relevant local organizations and/or NGOs in carrying out the measures of the Indigenous Peoples Plan.

Budget and Financing

This section provides an itemized budget for all activities described in the Indigenous Peoples Plan.

Annex IV. Safeguard Eligibility and Impacts Screening

This is the standard screening tool, which would be developed to suit the PFP and which would need 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.

Usually, the tool is filled out by a Safeguards Specialist and reviewed by a 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 Safeguards Specialist in consultation with the WWF GEF Agency Safeguards Specialists and relevant local agencies such as the fund administrator, based on the information provided in this screening form, as well as interviews with the PMU/CTF staff, local communities, and any other relevant stakeholders.

Part 1: Basic Information

1	Activity Name	
	Description of Activity ("sub-activities")	
2	Type of Activity:	New activity <input type="checkbox"/> Continuation of activity <input type="checkbox"/>
3	Activity location:	
4	Total size of site area	
5	Activity implementation dates	
6	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; 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?			

No.	Screening Questions: <i>Would the project activity</i>	Yes	No	Comments/ Explanation
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
<i>Environmental Impacts</i>			
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): Provide additional details:
3	Involve reforestation or modification of natural habitats? 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 and 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?		
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)?		
15	Based on the results of the questions above, what are the potential cumulative environmental effects to the given landscape?		
<i>Socio-Economic Impacts</i>			
16	Negatively impact existing tenure rights (formal and informal) of individuals, communities or others to land, fishery, and forest resources		
17	Operate where there are indigenous peoples and their lands/territories/waters are located? OR Operate where any indigenous communities have close cultural/spiritual or land use relationships? If yes to either, answer questions:		
	a. Has an FPIC Process been started? b. Will any restrictions on their use of land/territories/water/natural resources be restricted?		
18	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?		
19	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?		
20	Operate where there are any cultural heritage or religious or sacred sites that may be impacted by the project?		

21	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?		
22	Based on the results of the questions above, what are the potential cumulative socio-economic effects to the given communities?		
<i>Labor and Working Conditions</i>			
23	Involve hiring of workers or contracting with labor agencies to provide labor? If yes, answer questions a-b below:		
	<ul style="list-style-type: none"> a) Are labor management issues prevalent in the landscape? b) Are illegal child labor issues prevalent in the landscape? 		
24	Involve working in hazardous environments such as steep, rocky slopes, areas infested with poisonous animals and/or disease vectors?		
<i>Indigenous and Vulnerable or Minority Groups</i>			
25	Negatively affect vulnerable groups (such as ethnic minorities, poorer households, migrants, and assistant herders) in terms of impact on their economic or social life conditions or contribute to their discrimination or marginalization?		
26	Negatively affect the livelihoods and/or customs and/or traditional practices of indigenous groups?		
27	Stir or exacerbate conflicts among communities, groups, within families 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.		
28	Based on the results of the questions above, what are the potential cumulative effects to the given communities?		
<i>Occupational and Community Health and Safety</i>			
29	Involve any risks related to the usage of construction materials, working high above the ground or in canals where slopes are unstable or there is a risk of drowning?		
30	Generate societal conflicts, increased risk of sexual exploitation, abuse or harassment or pressure on local resources between temporary workers and local communities?		
31	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		
32	Expose the local community or project workers to health risks, including COVID-19		
33	Work in areas where forest fires are a threat? If yes, how recently was the last one?		
34	Work in areas where there the presence or history of vector-borne diseases (some examples include malaria, yellow fever, encephalitis)		
<i>GBV/ SEAH Risks</i>			
35	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?		
36	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)? The response must consider risks not only at the beneficiary level, but also to workers within all the organizations receiving GCF funding.		
37	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 GCF funding.		
38	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.)?		
<i>Conflict Sensitivity and Risks</i>			
39	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:		
	<ul style="list-style-type: none"> 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. implementing 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-Pakistan 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?		
40	Could the activities create conflicts among communities, groups or individuals?		
41	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?		
42	Do the activities provide opportunities to bring different groups with diverging interests positively together?		
43	Based on the results of the questions above, what are the potential cumulative effects of conflict (increasing or decreasing) in the given landscape on the relevant communities?		

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: _____

Screening Conclusions [TO BE COMPLETED BY Safeguards Specialist]

i. Main environmental issues are:

ii. Permits/ clearance needed are:

iii. Main social issues are:

iv. Further assessment/ investigation needed and next step.

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

Screening Tool Reviewed by:

Signed:

Name: _____

Title: _____

Date: _____

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 Labour.
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.

Annex V: Guidance for development of Livelihood Restoration Plans

The development of site-specific management plans as part of the project may result in restrictions of access to livelihoods and natural resources for local communities. Describe in more detail what this may look like in project.

Any change of land use, sea use or new zonation should be based on free and prior informed consultations of the affected communities and relevant authorities, which should be carried out prior to finalizing any usage changes.

Livelihoods-related support during project implementation will be provided to the households (HH) of all communities impacted by project-induced restrictions of access to natural and community resources within the targeted areas. This process will be organized in the following manner:

- Screening
- Social assessment
- Livelihood Restoration Plans
- Mitigation measures as part of the LRPs
- Compensation