The Ministry of Finance, Trade, Investment and Economic Planning
Republic of Seychelles

THIRD SOUTH WEST INDIAN OCEAN FISHERIES GOVERNANCE AND SHARED GROWTH PROJECT (SWIOFish3)

Guidelines for developing

Environmental and Social Safeguards Instruments

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1 Environment and Social Safeguards

This document focuses on the requirements for environmental and social safeguards. It aims to increase the likelihood that each project will achieve the objectives of the environmental and social safeguards set out in the World Bank Safeguards Policies by adding clarity, providing further technical guidance, and recommending good practices in the implementation of the safeguards policies.

The safeguards policies requirements for environmental and social safeguards support the integration of environmental and social considerations into project decision making process. They are triggered if a proposed project is likely to have environmental and social impacts and risks to the physical, biological, socioeconomic, and/or physical cultural resources in the project's area of influence. Socioeconomic factors include potential impacts on livelihood through environmental media, health and safety, vulnerable groups, and gender issues.

To comply with the safeguards policies requirements, it is crucial for proponents to take note that environmentally and socially sustainable projects are primarily achieved through a good project design during project preparation and effective environmental and social management during project implementation.

1.1 Environmental and Social Assessment throughout Project Cycle

An environmental and social assessment is a generic term describing a process of environmental and social analysis and planning to address the environmental and social impacts and risks associated with a project. For a proposed project likely to have environmental and social impacts and risks, it is required for the proponent to undertake environmental and social assessment to identify and assess the potential environmental and social impacts, and design and implement appropriate mitigation, management, and monitoring measures to address such impacts and risks.

The environmental and social assessment and planning process is most effective when initiated early during project preparation as it allows the proponent to:

- Assess relevant potential impacts and risks associated with the proposed project;
- Assess the compliance of the proposed project against applicable environmental and social laws and regulations of the jurisdictions in which the project operates;
- Incorporate impact avoidance, minimization and/or mitigation measures early into the project design process so that they can be easily accommodated

Delays in the implementation of project because environmental and social issues were not considered during the design phase can be significantly costlier than conducting a focused and comprehensive environmental and social assessment at the outset. In some cases, the environmental and social assessment may identify problems that are so serious that the project cannot proceed.

The environmental and social assessment should analyze and document potential impacts and risks for every key stage of the project cycle, covering design and planning, construction, operation/implementation, and decommissioning/closure. Environmental and social assessment is therefore not a one-time report prepared at the project feasibility stage but in accordance with international good practice should take place until project end. Effective environmental and social assessment and management contain all the elements deemed necessary and appropriate to "plan, do, check, act," and address problems as they arise, regardless of the project phase.

The activities and outputs of the environmental and social assessment process will vary with the nature of each project. The level of detail and comprehensiveness of an environmental and social assessment report should be commensurate with the impacts and risks of the project. Nevertheless, environmental and social assessment and management for projects typically includes the following:

1.1.1 Environmental and Social Screening

Screening helps determine (i) anticipated environmental and social impacts, risks and opportunities of the project (ii) if the anticipated impacts and public concern warrant further environmental and social analysis, and if so to recommend the appropriate type and extent of assessments needed. Screening is the process by which proposed projects are reviewed to determine the level of environmental and social assessment to which they should be subjected, which could range from none at all up to a full Environmental and Social Impact Assessment (ESIA). It is the process of reviewing a proposed activity against a checklist of factors to determine whether it is likely to have adverse environmental and social effects, and if so, to what extent, and what mitigation measures should be applied. It basically entails:

- Brief description of the project
- Identification of potential environmental and social impacts
- Mitigation measures
- Project classification and requested environmental and social work

1.1.2 Safeguards Instruments

Once the potential negative impacts and risks have been identified, the next step is to request the proponent to develop the safeguards instrument/s. Safeguards instruments should identify the environmental and social impacts and proposed mitigation measures, and details of management and monitoring plans, including specifications on responsibilities, cost and schedules, as well as information on how management and monitoring of the mitigation measures will be undertaken. Depending on the type of projects, there are two main instruments that can used by proponents to address environmental and social safeguards and they are:

- Environmental and Social Impact Assessment (ESIA)

- Environmental and Social Management Plan (ESMP)

2 Environmental and Social Impact Assessment (ESIA)

Environmental and Social Impact Assessment (ESIA) is an instrument to identify and assess the potential environmental and social impacts of a proposed project, evaluate alternatives, and design appropriate mitigation, management, and monitoring measures.

ESIA should be seen as a process that starts at the conceptual design stage of a project and continues throughout project implementation and operation. During the process, several deliverables are prepared to guide the activities of the specific stage.

The purpose of an ESIA is to identify the positive and negative impacts caused by project implementation. This is assessed through an analysis of the effects resulting from interaction between environmental and social components and the various activities of a project and its development, including temporary (for example, during construction) and associated facilities.

ESIA should include the following:

1. Executive (non-technical) Summary
    - Significant findings and key recommended actions;
    - Residual risks
2. Policy, Legal and Administrative Framework
    - Where national framework is sufficient to provide desired results and where incremental measures are needed to meet safeguards requirements
    - Whether project as proposed will comply with national laws/regulations
    - Institutional framework for implementation
3. Project description: Relevant aspects of project context (sectorial, geographic, institutional, etc.)
    - Key elements of proposed project (objectives, location, design, implementation)
    - Emphasis on aspects relevant to its potential environmental and social impacts
4. Site description/baseline data (including methodology)
    - Identity and status of valuable/vulnerable environmental /social/cultural assets which may be at risk
    - Relevant trends (for potential cumulative impacts)
5. Environmental and social impacts, and analysis of alternatives
    - What potential impacts can be avoided/reduced through good project siting and design?

- What potential impacts probably can't be avoided entirely but can be reversed (restoration)?
- What potential impacts can't be avoided or reversed but can be reduced to acceptable levels through mitigation?
- What if any significant impacts can't be avoided or mitigated (residual impacts)?

6. Mitigation and Monitoring Measures
    - What must be included in project design and implementation to keep negative impacts to acceptable levels and maximize positive impacts to extent possible?

3 Environmental and Social Management Plan (ESMP)

Environmental and Social Management Plan (ESMP) is an instrument that details (a) the measures to be taken during the implementation and operation of a project to eliminate adverse environmental and social impacts, or to reduce them to acceptable levels; and (b) the actions needed to implement these measures.

It effectively provides the mechanism through which the findings of the ESIA and the associated mitigation measures are implemented as the project moves beyond the study phase into execution phase. An ESMP is typically a living document and should be reviewed and updated on a periodic basis depending on the nature of impacts occurring, changes in the receiving environment and/or regulations, changes in internal organizational requirements, etc. The purpose of the ESMP is to:

- Ensure that any conditions of approval submitted by a regulator and/or lender are met
- Ensure that the resources allocated for environmental and social management are sufficient so that the follow-up is consistent with the significance of impacts
- Verify environmental and social performance and ensure that direct or indirect impacts on communities are understood and continually managed
- Respond to changes in project implementation and
- Respond to unforeseen events

The scope of an ESMP will differ according to specific project requirements; however, an ESMP will typically include the following measures:

- Mitigation measures to be implemented during the implementation and operation phases
- References to control guidelines and standards
- Responsibilities for the implementation of the ESMP
- Verification, monitoring and training requirements and

- Reporting requirements

In addition to an overall ESMP, detailed plans addressing each of the impacts identified should be prepared.

The ESMP should cover the following[1]:

1. Introduction
2. Brief description of relevant environmental and social characteristics of project site
3. Project Description
    - Focus on impact-generating activities (e.g., demand of water and materials, earth movement, etc.)
    - Environmental liabilities: identify and include a photographic registry of pre-existing environmental liabilities (e.g., gully erosion areas, abandoned borrow pits, unauthorized dumping sites, etc.) and, hence, not attributable to project implementation
4. Potential Impacts during Implementation and Operation (Mobilization, Construction and Demobilization)
    - Apply simple rating of significance
    - Quantify/qualify impacts (e.g., surface and type of vegetation to be removed, amount and type of wastes to be generated, noise levels, etc.)
    - Describe impacts by chain age (linear infrastructure projects or linear components of infrastructure projects) and/or identify places where specific impacts will manifest (non-linear infrastructure projects)
5. Mitigation Plan
    - Identify feasible and cost-effective measures that may reduce adverse environmental and social impacts
    - Identify and summarize all anticipated significant adverse impacts;
    - describe in details all mitigation measures:
        - From Good practices manuals (i.e. internationally adopted practices/ methods/protocols for specific activities; e.g. transmitter implants on shark, tagging of birds etc.)
        - Specify the detailed measures to mitigate the identified impacts (also by chain age and/or location)

[1] This is if the ESMP is a standalone document. However, if the ESMP is embedded in the ESIA (i.e. section 6 of the ESIA template above), certain aspects here are not necessary because they are already covered in the ESIA.

- Include designs for measures requiring structural solutions (e.g., gabions, etc.)
- Include the schedule of implementation of mitigation measures (in relation to the general construction schedule)
- Health and Safety Management Plan (detailed) (Annex 4.1)
- Waste Management Plan (detailed) (Annex 4.2)
- Traffic Management Plan (detailed)
- Training Program (detailed)
- HIV/AIDS Awareness and Prevention Program
- Community Relations Program
- If applicable, location and technical specifications for installation and operation of campsites, including workshops, garages, laboratories, offices, sanitary installations, etc.
- If applicable, location and technical specifications for operation of quarries and borrow pits, and procedures for negotiation with and compensation of land owners where they are located
- If applicable, location and technical specifications for installation and operation of concrete batching, stone crushing, cement mixing and asphalt plants
- If applicable, location and technical specifications for installation and operation of temporary and permanent dump sites

- Estimate any potential environmental and social impacts of these measures;
- Provide linkage with any other mitigation plans (e.g. involuntary resettlement, etc.) required for the project

6. Inspection Plan
    - Inspection function: specify frequency, locations and instruments (e.g., checklists, site reports, photo registry, etc.) to conduct site inspections
    - Permitting: required environmental permits and schedule to obtain them

7. Monitoring Plan
    - Identify monitoring objectives and specify type of monitoring with linkages to impacts assessed in the environmental assessment
    - Provide info about key environmental and social aspects of the project, particularly the environmental and social impacts of the projects and effectiveness of mitigation measures.

- Specific description of monitoring measures: parameters to be measured, frequency of measurement, sampling locations, methods to be used, equipment, units/measures, quality standards, threshold determination for need for corrective measures and reporting requirements and periodicity, including establishment of trends.
- Monitoring and reporting procedures to ensure early detection of conditions that require particular mitigation actions, provide info on progress and results of mitigation.

8. Institutional capacity development and training
    - Draw on assessment of the existence, role and capability of environmental and social units on site or agency and Ministry level
    - Recommend training of staff/expansion of such units to allow implementation of environmental assessment recommendations

9. Organization and Management
    - Specify organizational structure, personnel, resource and equipment requirements, reporting requirements and periodicity, and inter-institutional communication and coordination mechanisms

10. Implementation schedule and cost estimates
    - Provide implementation schedule for mitigation, monitoring and capacity development with phasing and coordination with overall project implementation plans
    - Provide capital and recurrent estimates costs and sources of funds for implementing ESMP i.e. figures to integrate into total project's cost table

11. Annexes
    - If the proponent/contractor wishes to incorporate information beyond the indicated above, such as the policy, institutional and regulatory framework for environmental management in Seychelles, biophysical and socioeconomic characteristics of the area of influence of the project, World Bank safeguards policies, etc., that information should be included as an annex and not in the body of the site-specific ESMP. Preferably, such information should not be attached.
    - Annexes should be used, if necessary, to include detailed information on the specific topics of the ESMP (e.g., inspection forms or checklists, design of structural mitigation measures, photographic registry of environmental liabilities, etc.)

Grievance Redress Mechanism

In line with the World Bank safeguards policies, the SWIOFish3 project has developed a Grievance Redress Mechanism (GRM) to receive, process and respond to complaints from any person or group of people related to the project or is affected by its activities. The GRM is a system designed to answer questions, clarify doubts and resolve implementation problems and complaints of individuals or groups affected by

SWIOFish3 project activities. GRMs are intended to be accessible, collaborative, efficient, and effective in resolving concerns through dialogue, joint fact-finding, negotiation, and problem solving.

Grievances can surface at different stages of the project cycle. Some grievances may arise during the project design and planning stage, while others may come up during project implementation. In general, grievances that may be encountered in the implementation of the SWIOFish3 project can be grouped into three categories:

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

Proponents is required to customize how the GRM is to be used in their specific project. Reference should be made in the ESMP about the GRM procedures with some details of the GRM manual (separate documentation).

4 Annexes

4.1 Health, Safety Management Plan (HSMP)

Health and Safety Management Plan (HSMP) is an instrument that outlines the safety measures and procedures to be taken during the implementation and operation of a project. It cover all aspects of safety management including such things as hazard management, accident and incident reporting, and emergency readiness.

HSMP is developed as a subcomponent (mitigation plan) of the overall ESMP for the project. The proponent/contractor shall be responsible for the development and implementation of, and compliance with, a site-specific HSMP based on the specification in the screening report or/and ESIA.

The HSMP should cover the following:

1. Introduction (including objectives of the HSMP).
2. Hazard Prevention and Control
    - Risk assessment (including description of risk assessment method used).
    - Prevention, protection and control measures (based on risk assessment performed):
        - Personal protective equipment and clothing: safety goggles, ear plugs, work boots, dust masks, protective clothing etc.
        - Health and safety, and sanitary facilities, equipment, materials and personnel: first-aid kits and stations, health personnel, safe drinking water, accommodations, washing facilities, domestic waste disposal, etc.
        - On-site safety measures and procedures to protect workers against accidents and health risks in the performance of construction-related activities/ undertaking research in remote location
3. Health and Safety Training Program
    - Provide specifics of training and instruction: topics, frequency, modalities, target audiences, instructors, training materials, etc.
    - Potential topics:
        - Occupational safety risks and prevention
        - Health risks and prevention
        - Use of personal protective equipment
        - Safe work procedures: general and specific

4. Organization and Management

    - Organizational structure, personnel, equipment, communication and reporting requirements, accident and incident reports, and procedures and tools to verify and ensure compliance with occupational health and safety requirements

5. Annexes

    - Annexes should be used, if necessary, to include detailed information on the specific topics of the HSMP, such as (illustrative list):
        - Accident report forms
        - Dangerous occurrence forms (near misses)
        - Safety audit forms
        - Safety check list
        - Safety rules
        - List of hospitals, emergency evacuation strategy and other arrangements to treat seriously injured staff
        - List of personnel trained in first aid and their places of deployment
        - List of first aid kits and locations where these will be held

Note: *HSMP should be prepared when relevant and necessary and cannot be standalone safeguards document, instead subsumed within the ESMP.*

A good reference for Environment Health and Safety (EHS) is the International Finance Corporation (IFC) Guidelines; https://www.ifc.org/wps/wcm/connect/554e8d80488658e4b76af76a6515bb18/Final%2B-%2BGeneral%2BEHS%2BGuidelines.pdf?MOD=AJPERES

4.2 Waste Management Plan (WMP)

Waste Management Plan (WMP) is the written record of what must be done to achieve the goals set for managing waste.

The objectives of the plan are to:

- Establish waste management priorities based on the understanding of the potential Environmental, Health and Safety (EHS) risks and impacts associated with the project and considering the consequences of waste generation

- Considerate the prevention, reduction, reuse, recovery, recycling , removal and disposal of waste arising from project activities in such a manner as to minimise the potential impacts to human health and the environment
- Disposal of waste that cannot be recovered or reused at approved facilities and in an environmentally sound manner
- Minimise, contain, transport, handle and dispose of solid and liquid wastes arising from project activities in such a manner as to minimise impacts to human health and the environment

The waste management plan should cover the following:

1. Introduction
2. The project description
3. The potential environmental and social impacts
4. The political, legal and administrative framework for waste management
5. The waste management implementation approach:
    - Establish goals and objectives
    - Specify who is responsible for managing waste on site (collection site and disposal site)
    - Estimate the waste types and amounts involved
    - Set targets for minimizing and reducing the amount of each waste sent to landfill
    - Describe recycling/reuse methods for each material
    - Describe waste collection, storage, transport and disposal
    - Identify the waste destinations and transport modes, including what materials are being segregated on site for reuse or recycling
    - Track progress
    - Describe special measures for material use and handling
    - Describe communication and training to support and encourage participation from everyone on site

Note: *WMP should be prepared when relevant and necessary and cannot be standalone safeguards document, instead subsumed within the ESMP.*

4.3 Livelihood Restoration Plan (LRP)

Livelihood Restoration Plan (LRP) is an action plan designed to restore, substitute and/or improve project affected persons' (PAPs) livelihoods to pre-displacement levels while maintaining the sustainability of the protected area. It basically provides information regarding the potential impacts on livelihood and introduce applicable measures and means of compensation along with defining the roles and responsibilities to implement the proposed Livelihood Restoration Strategy (LRS).

Specific objectives of LRP are to:

- Provide background on livelihoods in the area,
- Report on the findings of focus group discussions with affected people
- Identify feasible livelihood restoration options and alternative economic activities that can be facilitated
- Specify an implementation schedule for activities and programmes

The LRP should cover the following:

1. Introduction (project description, project objectives, LRP objectives)
2. Legal and Institutional Framework (institutional framework, legal framework, national verses international requirements gap analysis, resettlement and livelihood restoration policy)
3. Stakeholder Engagement, Consultation and Participation (stakeholder engagement approach, identification of stakeholders, stakeholder consultation, managing stakeholder expectations, future engagements)
4. Socioeconomic Baseline Survey (data collection methodology, demography, education, livelihood, income and expenditure, health, cultural heritage, community groups, infrastructures, development priorities, right-of-way communities)
5. Project Impacts (efforts to minimize displacement, displacement impacts, scope of displacement)
6. Compensation Framework (eligibility, entitlements)
7. Livelihood Restoration Activities (key principles guiding livelihood restoration planning, process for determining livelihood restoration options, livelihood restoration programmes, vulnerable groups)
8. Grievance Management Procedure (objectives of grievance procedure, grievance reception, grievance forms, grievance management)
9. Organisational Framework (organizational framework, livelihood restoration steering committee, livelihood restoration working group, institutional structure and functions)
10. Monitoring and Evaluation
11. Schedule

Note: *LRP should be prepared when relevant and necessary and cannot be standalone safeguards document, instead subsumed within the ESMP.*

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