

Good
Practice
Note

Environment & Social
Framework for IPF
Operations

**Managing the Risks
of Projects
Involving
Protected and
Conserved Areas**

Note: This Good Practice Note replaces the Interim Guidance Note issued in January 2025

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Acronyms and Abbreviations

ADM	Accountability and Decision Making
CoC	Code of Conduct
CSO	Civil Society Organization
DPO	Development Policy Operation
E&S	Environmental and Social
EIDO	Essential, Important, Desirable, Optional
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESIRT	Environmental and Social Incident Response Toolkit
ESS	Environmental and Social Standard
FCPF	Forest Carbon Partnership Facility
FCV	Fragility, Conflict, and Violence
FPIC	Free, Prior, and Informed Consent
GBV	Gender-based Violence
GPS	Global Positioning System
GM	Grievance Mechanism
ICCWC	International Consortium on Combating Wildlife Crime
IPF	Investment Project Financing
IPP	Indigenous Peoples Plan
IPPF	Indigenous Peoples Planning Framework
IPs/SSAHUTLCs	Indigenous Peoples / Sub-Saharan African Historically Underserved Traditional Local Communities
ISFL	Initiative for Sustainable Forest Landscapes
ISR	Implementation Status Report
IUCN	International Union for Conservation of Nature
LRP	Livelihood Restoration Plan
MoU	Memorandum of Understanding
NGO	Nongovernmental organization
OECMs	Other Effective Areas-based Conservation Measures
OP	Operational Policy
PAD	Project Appraisal Document
PAP	Project-affected Person
PCA	Protected and Conserved Area
PDO	Project Development Objective
PF	Process Framework
PIU	Project Implementation Unit
RP	Resettlement Plan
RPF	Resettlement Policy Framework
SEP	Stakeholder Engagement Plan
SOGI	Sexual Orientation and Gender Identity
SOPs	Standard Operating Procedures
TA	Technical Assistance
ToRs	Terms of Reference
UN	United Nations

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1. Overview

1. Projects involving Protected and Conserved Areas (PCAs) are critical to development and to the World Bank's vision of creating a world free of poverty on a livable planet. The global decline of nature threatens livelihoods, health, and climate stability, with a disproportionate impact on low-income countries. World Bank modelling shows that even when only a few ecosystem services collapse, low-income countries could forego 10 percent per year in real GDP by 2030. Investments in PCAs contribute to the implementation of the Kunming-Montreal Global Biodiversity Framework, while also providing other benefits, including climate mitigation, disaster risk reduction, food security, job creation, and the preservation of cultural and spiritual values.

2. Yet such projects can present risks that need to be carefully managed. The main ones typically flow from four conditions commonly present in projects involving PCAs:

- **Size:** PCAs can be vast, making the drawing of project boundaries, the assessment of socio-economic conditions and project impacts, and project supervision more challenging;
- **Access restrictions/enforcement:** The creation of new access restrictions in PCAs or the enhanced enforcement of existing ones can cause adverse impacts on the livelihoods of those who access or use resources in the PCAs, many of whom may be marginalized and vulnerable;
- **Human-wildlife interactions** and the enforcement of PCA rules present risks of harm to enforcement personnel and local communities; and
- **Indigenous Peoples' presence:** PCAs may encompass land historically owned or traditionally used by Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (IPs/SSAHUTLCs) or other local communities that remains contested or subject to historical tensions and legacy issues.

3. This Good Practice Note (Note), together with its annexes, lays out ways in which these risks can be assessed and addressed. It is intended to help ensure that projects are designed, assessed, and implemented in compliance with the Bank's policies and guidance. Such compliance in turn helps to address adverse impacts on communities and the environment and enhance the development benefits of Bank-financed projects, particularly for those living in or near PCAs. The Note does not introduce new requirements; rather, it interprets and clarifies the requirements of existing Bank policy. The main Bank policies relevant to this Note are summarized in **Annex I**. They include the Environmental and Social Framework (ESF) and related procedures and guidance, as well as the Bank Policies on Investment Project Financing (IPF) and on Development Cooperation and Fragility, Conflict, and Violence (FCV). The management of these risks is a joint responsibility of Task Team Leaders, environmental and social (E&S) specialists, and Bank Management, based on a combination of careful project design, E&S risk management, diligent supervision, and engagement with Borrowers.

4. Given its focus on Bank policy compliance, the Note does not recommend more general good practices for the design and management of PCAs in World Bank-financed projects. However, these good practices are also essential to the project's success, the sustainable management of PCAs, and the wellbeing of local communities. Some considerations may even inform the extent to which the project can realistically be achieved in a manner consistent with Bank policies. For example, where national and local governments are not open to community participation in PCA management, or where applicable laws categorically prohibit local communities from accessing PCAs, it may be difficult for Bank-financed projects to garner community support or include an effective process for addressing adverse impacts on livelihoods that result from restrictions of access to PCAs. Therefore, early in project planning, the Bank should check whether the right conditions exist for a successful and policy-compliant project, talk with the Borrower about any challenges, and consider possible solutions.

2. Projects Concerned

5. This Note applies to all IPF projects¹ that involve, whether directly or indirectly, in full or in part, Bank support to establish or manage PCAs, whether as a project activity, a project impact, an associated facility, or an E&S risk mitigation measure. The scope of the project, its impacts, and the applicability of this Note are determined based on the Project Development Objective (PDO), the project activities and results indicators in the Project Appraisal Document (PAD) and financing agreement, and the impacts assessed in the Environmental and Social Review Summary and E&S documents.

6. “Protected and Conserved Areas” refer broadly to areas formally recognized as protected areas and to other areas managed with conservation objectives. The International Union for Conservation of Nature (IUCN) defines a “protected area” as a “clearly defined geographical space, recognized, dedicated, and managed, through legal or other effective means, to achieve the long-term conservation of nature with associated ecosystem services and cultural values.”² IUCN also recognizes the importance of “conserved areas,” a broader term referring to areas that are not formally designated as protected areas but that make important contributions to the long-term conservation of nature.³

7. PCAs can take several forms and names—including, among others, national parks, reserves, forest reserves, locally managed marine areas, community and private conservancies, and conservation areas—and involve a range of objectives and management categories.⁴ PCAs also follow a range of governance models, including government management or government-delegated management—e.g., to a nongovernmental organization (NGO) under a collaborative management partnership—shared or joint management, private sector management, or management by IPs/SSAHUTLCs or local communities. This note applies to all PCA management categories, conserved areas managed with a primary or secondary conservation management objective, and all governance models.

8. Projects that support the establishment and management of PCAs can take many forms. As shown in **Table 1**, they often have natural resource management objectives, under ministries of agriculture, natural resources, or environment. However, projects in other sectors can also involve PCAs, including transportation, agriculture, energy, water, and private sector development. Relevant activities include those that create new PCAs, or that expand or create new levels of protection in existing ones. They also include activities that strengthen the management of PCAs and enforcement of their rules, such as creating restrictions of access to PCAs or enhancing existing rules. Relevant activities in this regard include the financing of supplies and equipment that can be used for PCA rules enforcement (e.g., uniforms, tents,

¹ Program-for-Results Financing can present similar issues and could be informed by this Note. Development Policy Operations (DPOs) also deserve consideration. While the ESF does not apply to DPOs, the Bank Policy on Development Policy Financing requires the Bank to assess and address the significant E&S effects of prior actions. Prior actions focused on establishing or managing PCAs may present risks similar to those addressed in this Note.

² IUCN, *Guidelines for Applying Protected Area Management Categories* (2008).

³ “Conserved areas” as defined in this Note is a general term that encompasses those Other Effective Area-based Conservation Measures (OECMs) that are managed with a primary or secondary conservation objective. OECMs is a formal term defined under the Convention on Biological Diversity to recognize geographic areas that can be governed, managed, and used for a range of purposes, as long as this results in biodiversity being effectively conserved. For more information on OECMs, see IUCN, *Guidance on Other Effective Area-based Conservation Measures* (2024).

⁴ IUCN defines six management categories for protected areas, ranging from strict nature reserves, in which human visitation, use and impacts are strictly controlled and limited to ensure protection of conservation values, to protected areas with sustainable use of natural resources, which aim to conserve ecosystems alongside associated cultural values and traditional natural resource management systems. This Note applies to all six categories.

binoculars, night vision goggles, vehicles, boats, telecommunications, drones), financing of multi-use civil works in or around PCAs that will result in enhanced PCA management (e.g., ranger posts, beacons delineating PCA boundaries, airstrips, new or upgraded roads), strengthening the capacity of institutions with a management role in PCAs (e.g., technical assistance for PCA management plans, trainings),⁵ and support for community-based enforcement of PCA rules. Biodiversity offsets to address potential adverse impacts caused by a project are also relevant.

9. Community-based natural resource management projects, such as community forestry or fisheries projects, can also involve support for PCA management and give rise to many of the same risks as legally designated protected areas. They therefore fall within the scope of this Note. For example, restrictions on access to community-based natural resources, such as land set aside for a forest reserve, may adversely affect individuals who depend on access to that land for their livelihoods. For example, the enforcement of rules of access to natural resources by community members rather than government officials may still pose risks to community members. As explained further below in paragraph 32, community-based PCAs need to be assessed on a case-by-case basis in relation to the applicable provisions of the ESF and other Bank policies.

10. In limited cases, projects will involve PCAs but not support their establishment or management; this means they fall outside the scope of this Note. For example, a project that finances only civil works in a narrow section of a PCA under a PDO unrelated to PCA management (e.g., visitor center or research lab where the PDO is to improve scientific research) would fall outside the scope of this Note. However, even a project that finances civil works in a narrow section of a PCA will be subject to this Note if those works (e.g., visitor center, airstrip), other project activities, or the PDO focus on supporting the establishment or management of the PCA.

11. Finally, even where enhanced PCA management is not a project activity, it may still be related to the project through other activities that are subject to this Note and need to comply with Bank policy. In particular, the establishment or management of a PCA may be a direct, indirect, or cumulative impact of the project, or a mitigation measure of the project. Such situations include the creation of a PCA as a biodiversity offset and the strengthened protection of an existing PCA from labor influx related to nearby project-financed civil works. Similarly, activities that are “associated facilities” need to comply with the ESF to the extent of the Borrower’s control or influence.⁶ Whether PCA management activities are “associated facilities” will depend on the facts of each project. Such situations may include those where the Bank is financing the creation or expansion of a PCA, and the necessary enforcement of the corresponding PCA rules is not financed by the project but would not have been extended to that area if the project did not exist. As another example, the project may finance personnel who do not have a mandate to enforce PCA rules (e.g., forest guides, conservation staff, or community stewards), but the conservation objectives of the project depend on those project-supported personnel referring any violation of PCA rules to an organization that does have an enforcement mandate, and the resulting enforcement actions would not have occurred without the project. The Bank carefully reviews the scope of project activities, impacts, and associated facilities to ensure they can be carried out in accordance with the Bank’s policies and within the scope of the Bank’s mandate. Finally, other activities that are not project activities, project impacts or mitigation measures, or associated facilities may still subject project stakeholders or the Bank to other

⁵ Where the project finances only technical assistance (TA), the Bank requires TA outputs to be consistent with the ESF, and the Bank considers but is not required to mitigate the downstream impacts of implementation of those TA activities. Still, those downstream impacts may be perceived by some stakeholders as being connected to the project, and clear communications and engagement may be useful. See OESRC Advisory Note, *Technical Assistance and the Environmental and Social Framework* (May 21, 2019).

⁶ See Environmental and Social Policy, paragraph 11.

risks, such as contextual or reputational risks, or threaten the project’s ability to achieve its PDO. While such risks fall outside the scope of this Note, the Note can be useful to identify and manage them as well.

Table 1: Types of Projects Covered by This Note (Non-Exhaustive)	
Illustrative Project Type	Illustrative Relevant Project Activities
Natural Resource Management	Creation of PCAs, or improved PCA management through enhanced enforcement of PCA rules, community-based resource management, habitat restoration, or private concession.
Forestry	Establishment of a new set-aside conservation area in a forestry concession; reforestation initiatives.
Fisheries	Creation or improved management of community-led initiatives to protect spawning or the habitats of certain species. ⁷
Ocean	Creation or improved management of marine PCAs.
Blue Economy	Marine spatial management; integrated coastal zone management.
Agriculture	Community-led natural resource management.
Transportation	Offsets for biodiversity protection; wildlife corridors; enhanced protection of PCAs made accessible by new roads.
Landscape	Government- or community-led resource management areas; invasive species eradication in PCAs.
Results-based payment involving PCAs	Operations under the Forest Carbon Partnership Facility (FCPF), BioCarbon Fund Initiative for Sustainable Forest Landscapes (ISFL), or similar programs. ⁸
Water	Protected natural or man-made water sources with conservation objectives; catchment protection in PCAs.
Energy	Offsets for biodiversity protection.

⁷ See also Guidance: Bank Financing of Fisheries Enforcement Activities: International Law Aspects, LEG5.06-GUID.151 (June 4, 2024).

⁸ FCPF and ISFL operations also need to comply with the Bank Directive, *Managing Environmental and Social Risks and Impacts for the Emission Reductions Programs under the Forest Carbon Partnership Facility and the BioCarbon Fund Initiative for Sustainable Forest Landscapes*, OPS5.07-DIR.129, Dec. 24, 2024.

3. Screening, Proportionality, and Phasing

12. This Note presents eleven issues to consider when preparing and supervising projects involving PCAs. Not all issues are relevant to all projects. This list should be used to screen projects and determine which issues are relevant and, if so, require further due diligence in accordance with this Note. **Annex II** proposes a **Template for a Protected or Conserved Area Profile** to help screen for these risks for each PCA under the project early in preparation.

13. Following screening, risk management follows the ESF principle of proportionality, according to which the type and depth of assessment and mitigation measures is proportionate to the risk. Risk profiles vary across types of PCA activities and governance structures. For example, a strictly protected area, such as a national park or wilderness area set aside to protect biodiversity values, may present higher risks of social exclusion compared to a PCA managed for multiple uses, including sustainable use of natural resources. A more strictly protected area may also present higher risks related to the enforcement of PCA rules. To manage such risks, the Borrower and the Bank may need to conduct **institutional assessments of and due diligence** into the capacity and practices of the entities charged with enforcing PCA rules, as explained in **Annex III**. However, the degree of reliance of local communities on the PCA resources and the quality of governance and management arrangements in each situation affect the degree of risk, such that a well-governed, strictly protected area in an isolated area may present lower risks than a PCA managed for multiple uses that is poorly governed and located in a densely populated area. **Annex IV lists illustrative degrees of risks** in different situations.

14. Proportionality also guides the timing of assessments and mitigation measures. While the ESF allows some assessments and mitigation measures to be carried out after appraisal, it requires the Bank to gather enough information before project approval about the risks and impacts of the project for three purposes: to assess whether the Borrower is capable of developing and implementing the project in accordance with the Environmental and Social Standards (ESSs), to assist the Bank in deciding whether to support the project and how E&S risks and impacts will be addressed, and to inform the Borrower's stakeholder consultations. In addition, the Borrower is required to complete the corresponding plans and implement mitigation measures in accordance with the Environmental and Social Commitment Plan (ESCP) before the start of project activities that may cause material adverse E&S risks and impacts. Depending on the level of risk, the Bank assesses how to manage risks related to missing information and other developments that may arise during project implementation. This includes determining whether the Bank and Borrower would agree to restructure the project if necessary, whether to establish additional risk monitoring systems, and whether to build into the legal agreement effectiveness or disbursement conditions or additional events of suspension.

15. A general understanding of who accesses and uses a PCA, when, and why, is important for the Borrower and the Bank to decide whether or not to support a project that will lead to access restrictions and to guide preparation if they decide to go forward.

- For example, the Bank and the Borrower may decide to wait until project implementation to prepare an institutional assessment of entities enforcing PCA rules, provided that the Bank knows enough by appraisal about those entities' track record and the risks of tensions with communities to make an informed decision about project approval and what mitigation measures to require from the Borrower, and provided that the Borrower commits to completing this assessment and the corresponding mitigation measures before the project begins providing support to such enforcement entities;

- In a second example, a Livelihood Restoration Plan (LRP) could be prepared during project implementation, provided that the anticipated social impacts from access restrictions are clearly identified, such as through a social assessment, to inform Bank decision-making and stakeholder consultations, and provided that the Borrower commits to completing the LRP and implementing its measures before starting activities that will restrict access to the PCA; and
- In a third example, as long as the risks and planned mitigation measures are carefully laid out for decision-makers, a project focused on creating a new PCA could proceed in phases after project approval, starting with biophysical and socio-economic assessments and stakeholder engagement, followed by drafting and enacting legislation that defines the boundaries and regulations of the PCA, and finally providing support for the management of the newly created PCA.

16. Where key facts and risks remain unknown at project appraisal about the proposed PCA, the Bank should establish milestones for their resolution in the ESCP and monitor and adapt project implementation as they are met or new risks emerge.

17. The timing and type of E&S assessments and documents needed for a given project should be decided in accordance with the Accountability and Decision Making (ADM) review and decision process. As usual, the level of risk determines the type of decision review meeting, and it is subject to change and adaptive management during project implementation.

4. Main Issues to Consider

18. The eleven issues below are grouped into three main categories: (i) Protected and Conserved Area Governance and Legal Framework; (ii) Social and Stakeholder Dimensions; and (iii) Project Management and Other Issues. Risk assessment and mitigation will be context- and project-specific. **Annex V** presents **Illustrative Assessments and Mitigation Measures** across the eleven areas of this Note.

Protected and Conserved Area Governance and Legal Framework

Issue 1: PCA and Project Boundaries

19. The Bank should precisely identify and document four separate areas, which may not be commonly understood by all stakeholders: (i) the PCA itself, including areas proposed to be converted or added to the PCA, and any designated buffer zones; (ii) the area in which project activities will take place (the “project area”), which can be smaller or larger than the PCA; (iii) the area in which associated facilities, if any, are or will be located; and (iv) the area in which the project and any associated facilities could result in direct, indirect, or cumulative impacts. The United Nations (UN) keeps databases of reported PCAs, which can serve as a starting point to identify any in the project area.⁹ These areas should be documented with a narrative description, maps, and/or Global Positioning System (GPS) coordinates, based on available government records, surveys, and community consultations. Any use of maps should be coordinated with and verified by the Bank’s cartography service and Country Management Units. When setting project boundaries, the Bank should confirm whether they will trigger the Bank’s Operational Policies (OPs) on projects on international waterways (OP 7.50) and in disputed areas (OP 7.60). The PDO, activities, and results indicators should be consistent with the description of the four areas above and the extent of project risks. Therefore, the PDO, activities and results indicators should be designed through an iterative process that considers the associated risks and impacts arising from the four areas. If the risks and impacts cannot be managed in accordance with Bank policies, the Bank should reconsider the project’s objectives and activities.

20. In setting project boundaries and assessing project risks and impacts in the four areas, the Bank should consider contextual factors that may affect the boundaries, including the following: (i) the PCA’s boundaries may be expanded, redrawn, or reclassified during project preparation or implementation in a way that may alter the project boundaries or risk profile; (ii) practical considerations that may make it impossible to confine project activities to one section of a PCA or a subsection of a PCA management entity; and (iii) legacy issues and/or ongoing conflicts that may lead to implementation challenges or adverse impacts.

Issue 2: Relevant Institutions

21. As required by the ESF for all projects, due diligence should confirm that relevant institutions and groups with a role in implementing project activities or managing their impacts—whether financed by the project or not—will operate in accordance with the mechanisms established and agreed for the implementation of the project and standards acceptable to the Bank (e.g., procedures, training, operational capability, systems to report and adapt to incidents, use of force protocols). Some governmental and nongovernmental institutions beyond the Borrower’s direct implementation agency may play a key role in the management of the PCAs under the project, the enforcement of PCA rules, and the implementation of a Process Framework (PF), LRP and other E&S documents. Depending on the country and PCA, such institutions and groups may include park management entities, military, private

⁹ See, e.g., Protected Planet, <https://www.protectedplanet.net/>

security personnel, ministries responsible for land administration, civil society organizations, IPs/SSAHUTLCs, or businesses and community groups. Some institutions' roles and responsibilities are laid out in the government's plan for the PCA in question (e.g., often called Protected Area management plan or strategy) and any such management plan should be assessed. These institutions should be involved as stakeholders in the process laid out in the Stakeholder Engagement Plan (SEP), PF, LRP and other E&S documents. The roles of these organizations, including how they will interact with local communities and other project-affected groups, should be spelled out in these E&S documents and in the project manuals. The ESCP should also make clear how the Borrower will ensure that relevant entities beyond the implementing agency will act in accordance with the ESSs through contracts, memoranda of understanding and other tools as appropriate.

Issue 3: Relevant Laws, Rules, and Operating Procedures

22. The creation, expansion, or adjustment of PCA boundaries or rules may restrict the ownership or use by local communities (including IPs/SSAHUTLCs) of land and resources, whether they reside inside the PCA or nearby (e.g., access to water, pasture, medicinal plants, burial or religious sites, traditional travel routes). Social tensions affecting PCAs are often rooted in or exacerbated by disputes over land and resource tenure and access rights. Understanding the roots of these disputes and their social and legal dimensions is critical for designing PCA projects, for the long-term sustainability of PCA management and for developing a robust set of mitigation measures such as those in an LRP or a "plan of action" resulting from a PF.

23. An assessment of land rights and claims should be undertaken early in project preparation, normally as part of the social assessment or Environmental and Social Impact Assessment (ESIA), to identify whether project activities in the PCA risk adversely affecting local communities' rights to live in or access the PCA or may require any involuntary resettlement. These assessments often reveal areas of legal, social, or historical ambiguity, inconsistency across applicable laws and land designations, and a disconnect between the formal legal framework, such as land use/zoning plans and PCA designations in national law, and actual land use, both on the side of government and local communities. Land disputes may date back many decades—sometimes to the establishment of the PCA—or may have emerged recently in connection with an influx of new settlers to an area, or with recent initiatives by government to enforce old laws or introduce new ones.

24. A starting point for the assessment should be to understand the origin and legitimacy of the land claims of people living in or using the PCA area. Different scenarios are possible. Some settlers in the area may have formalized, registered rights under a national land or other law. In other situations, people may not have formally documented land or resource rights but still benefit from some protection under national law as long-term residents/users that legally entitles them to occupy and/or use the land. In some countries, IPs/SSAHUTLCs are legally recognized as having use and management rights over ancestral lands. The assessment may reveal tensions between laws that declare the land in question to be state land and another aspect of the law that allows traditional communities or authorities to manage the use of land in accordance with customary norms. The legal status of transient communities such as pastoral groups or other seasonal users may be even less clear.

25. The assessment then needs to identify pursuant to which law and other arrangements the PCA was created, and how these laws interact with the existing land uses, rights or claims of the affected population. Ownership, management arrangements, and use rights may differ based on the type of PCA (e.g., national park, forest reserve, wildlife management area, community conservancy), applicable law (e.g., laws governing national parks, village lands, and fisheries; legal recognition of the semi-autonomous collective lands and territories of IPs/SSAHUTLCs), or social organization (e.g., traditional communities,

forest dwellers, IPs/SSAHUTLCs, other settlers). The assessment should consider to what extent the law(s) creating the PCA placed restrictions on preexisting land or resource ownership or use, purported to abolish preexisting land rights and uses, or required the resettlement of inhabitants or the curtailment of resource uses at the time of PCA inception and thereafter. If the PCA law requires resettlement, did this process take place or is it ongoing or planned? Was compensation paid? Or does the government tacitly allow people to stay in place even while claiming they are illegal? Does the law allow preexisting settlements to remain while placing restrictions on their expansion and prohibiting new settlements? Questions such as these can help pinpoint the sources of tensions around land and resources, and the extent to which existing law requires physical resettlement or could accommodate some level of continued local habitation or use within the PCA.

26. To consider all relevant risks and impacts, the assessment should cover the relevant history and context of the project area (sometimes referred to as “legacy issues” or “historical injustices”), seeking information from the Borrower and others as needed. Such legacy issues may relate to the creation of the PCA, resettlement, alleged acts of violence, lack of recognition of customary and other rights of IPs/SSAHUTLCs. Some legacy issues may present Bank policy compliance issues under the project. Even those that do not may reflect stakeholder concerns that are important to consider in project design, for example, to assess whether the project can contribute to resolving them or at least avoid exacerbating them. It is also important to develop a communication strategy to clarify the project’s scope and approach and prevent an escalation in tensions.

27. Separately, it is also important to consider laws and procedures that govern the enforcement of PCA rules. The management of PCAs and the enforcement of applicable rules can involve the use of force by PCA management entities and possibly other agencies involved in enforcing PCA rules (e.g., police, military) in accordance with national law. A PF and participatory and technically sound PCA management can contribute to minimizing such use of force by clarifying the rules governing access to the PCA with all relevant stakeholders, providing multi-stakeholder engagement mechanisms, and diffusing tension when conflicts may arise. But, where certain stakeholders violate the agreed processes (as described in the PF, other relevant E&S documents, or the PCA’s management plan), or outside interests that are not a part of the governance arrangements undertake unauthorized activities, enforcement of PCA rules may be necessary. Such enforcement may result in confrontations between or among: (i) community members knowingly or inadvertently using PCA resources in violation of the agreed rules (e.g., for grazing, fishing, hunting); and (ii) PCA management entities carrying out their duty to enforce those rules. PCA management entities may also encounter dangerous wildlife, or armed or hostile parties (e.g., criminal poaching gangs, contraband smugglers). Confrontations can sometimes lead to injuries, fatalities, or other forms of violence. Enforcement personnel, poachers, community members, and other actors can all be instigators or victims of violence.

28. Where the use of force becomes necessary, the Bank should require Borrowers to ensure that PCA rules enforcement personnel operating under the project employ such force only where necessary and in accordance with rules consistent with good international practice. The applicable rules and their adequacy should be documented in a Borrower–led institutional assessment. Which situations require an institutional assessment of enforcement entities depends on the project, and the depth of the assessment is proportionate to the risks. **Annex III provides information on such institutional assessments.** As explained in the Annex, where PCA rules enforcement is supported by the project, is an “associated facility,” or is a direct, indirect, or cumulative impact of project activities, a Borrower–led assessment is necessary, complemented by the Bank’s own due diligence throughout the project cycle. This assessment should confirm that the enforcement entities are bound by and use appropriate standards for the use of force that are consistent with good international practice. By contrast, where PCA rules enforcement

entities are operating in the project area but do not fall within the situations described above, the Bank conducts due diligence regarding the enforcement practices of those entities and the risks of tensions with communities that could also affect perceptions of the project and the Bank.

29. **Annex VI provides indicative terms of reference for Borrower-led institutional assessments** of PCA rules enforcement entities, including the main good international practice standards that should guide them. If such assessments identify shortcomings in the practices of those entities, the Bank should agree with the Borrower on gap-filling measures to complete, as specified in the ESCP, before the start of project activities leading to enforcement. Such measures could include improved training and equipment, or amendments to the Code of Conduct (CoC) and Standard Operating Procedures (SOPs) applicable to enforcement personnel. Annex VI also includes guidance for the Bank’s due diligence into risks to communities that could also affect perceptions of the project and the Bank in order to inform project design and approval. The decision about whether the associated risks are acceptable to the Bank, or whether the gaps should be filled before or after the project commences will depend on the judgement of the Bank and will be made in accordance with the ESF proportionality and ADM principles discussed in Section III of this Note.

Social and Stakeholder Dimensions

Issue 4: Access Restrictions

30. New restrictions or enhanced enforcement of existing restrictions on land use and access to natural resources in a PCA can adversely affect local communities’ livelihoods and food security (e.g., impacts on grazing, fishing, or hunting; water use; collection of firewood, timber, medicinal plants, and fruit) as well as access to sites, flora and fauna or materials that are important for cultural or religious purposes. Access restrictions can also generate or exacerbate tensions and competition among local groups currently or historically seeking access or asserting claims or rights to these PCAs and their resources for their livelihoods and/or their religious or cultural identities.¹⁰

31. ESS5 applies to restrictions on land use and access to natural resources and requires that the Borrower prepare a plan proportionate to the project risks and impacts to assist people affected by these restrictions to improve, or at least restore, their livelihoods and living standards. For legally designated parks or protected areas and “other common property resources on which local people may depend for livelihood purposes,” ESS5 also requires the plan to include a participatory process to determine appropriate restrictions and set out mitigation measures for livelihood impacts.¹¹ Additionally, ESS5 requires that measures be implemented to “either allow continued access to affected resources or to provide access to alternative resources with equivalent livelihood-earning potential and accessibility, provided that where common property resources are affected, benefits and compensation associated with restrictions on natural resource usage may be collective in nature.”¹²

32. ESS5 does not apply to restrictions of access to natural resources under “community-based natural resource management projects,” provided that an assessment satisfactory to the Bank establishes that the community decision-making process is adequate and reflects voluntary, informed consensus, and that appropriate measures have been agreed and put in place to mitigate adverse impacts, if any, on the vulnerable members of the community.¹³ But because ESS5 applies to projects that impose changes in

¹⁰ These groups might include communities meeting the criteria of ESS7, forest dwellers and seasonal users.

¹¹ ESS5, paragraph 21(d).

¹² ESS5, paragraph 35(b).

¹³ ESS5, paragraph 4(c), n.9.

land use that restrict access to resources in “common property resources on which local people may depend for their livelihoods,” as explained in the preceding paragraph, community-based PCAs should be assessed on a case-by-case basis to determine which provisions of the ESF and other Bank policies do apply to such projects.

33. Where adverse impacts from access restrictions are expected in a project, the Bank ensures that the Borrower carries out a social assessment of: (i) current uses and occupation of the project areas and the associated PCA and adjacent areas; (ii) land and resource rights and claims to the PCA as explained in paragraph 23 above; (iii) existing and anticipated migration into the PCA, including an overview of the livelihoods of those populations; (iv) any planned PCA expansion and strengthening of access restrictions, such as planned resource allocation for commercial activities or other restrictive uses; (v) the scope of expected livelihood and cultural impacts from project activities; (vi) the possibility of establishing or enhancing a participatory approach to PCA management, including assessing the enabling conditions described in paragraph 34 below; and (vii) the determination of appropriate mitigation measures and plans to address the adverse impacts of access restrictions. The social assessment can be done as part of an ESIA or other E&S assessment for the project or as a stand-alone process. As explained in Section III of this Note, this assessment should be carried out early enough in the project process to allow informed decision-making by the Bank and the identification of the necessary mitigation measures to require of the Borrower.

34. Where a project involving PCAs leads to access restrictions that do not involve physical resettlement, the primary E&S document aimed at mitigating impacts on livelihoods and cultural uses will take the form of an LRP. The LRP can be developed as part of the implementation of a PF if the enabling conditions for a PF are present. To determine whether the enabling conditions for a PF are present, the Bank and Borrower should consider the following factors, informed by the social assessment: (i) whether PCA management options that maintain, improve or restore livelihoods can be consistent with conservation objectives, in light of the resources available within the PCA and related areas and the number and nature of stakeholders in the area; (ii) whether the Borrower has the technical capacity, regulatory framework, and political commitment to develop and enforce rules of access to the PCA in a fair and equitable manner, and in accordance with agreements reached with local stakeholders; (iii) whether applicable laws, regulations and practices allow stakeholders to participate meaningfully in PCA management and implementation of a PF; (iv) whether legacy issues may lead to a level of distrust among the parties that does not allow for a constructive participatory decision-making process; and (v) whether initial assessments indicate that the parties are genuinely interested in and committed to reaching agreements on shared use, governance and benefit sharing. Whether to prepare a PF or an LRP/Resettlement Policy Framework (RPF), and whether to proceed with the project based on the underlying conditions, would be decided according to the ADM applicable to the project. For some projects, a PF may be appropriate for certain communities or areas while an LRP may be appropriate for other communities or areas.

35. Where enabling conditions are present, the Borrower may opt to prepare and implement a PF in accordance with Section C of Annex 1 to ESS5. A PF establishes a process by which affected communities participate in the design of, and agree to, project activities, resulting restrictions and mitigation measures, and project management. It identifies individuals within communities, community groups or communities who may be adversely affected, and it provides for measures to assist persons affected by livelihood restrictions. The PF also includes administrative, financial, grievance, monitoring, and other arrangements for implementation of the agreed activities. Where a project involves multiple PCAs or a large, diverse, or geographically dispersed group of project-affected people, with varying types and degrees of dependence on and claims to the PCA, the Borrower may prepare one PF for the entire project or separate PFs based

on an assessment of the most appropriate operational approach. The mitigation measures agreed in the PF or that result from the PF’s community engagement process are set out in an LRP or similar action plan, which may be part of a PCA management plan. The LRP or similar action plan includes measures to assist affected persons “in their efforts to improve their livelihoods or restore them, in real terms, to pre-displacement levels, while maintaining the sustainability of the park or protected area.”¹⁴ Such measures might include an agreement to maintain or restore full or partial access to critical resources in the PCA or to access acceptable alternative resources or livelihoods, including compensation. Mitigation measures, such as support to enhance sustainable livelihoods and resource use, can also be built into project design.

36. If the enabling conditions for a PF are not present, the mitigation and compensation measures should be agreed through the preparation of an LRP to meet the livelihood restoration objectives set out in ESS5. The LRP, prepared in consultation with affected parties, includes measures to mitigate and/or compensate for such impacts. An LRP identifies individuals within communities or community groups who are adversely affected on the basis of livelihood baseline surveys. It provides an assessment of impacts on livelihoods and resource rights (land and water uses, extractive and non-extractive resources, enterprises, revenue streams, access to opportunities and services, and cultural and religious uses) with a particular focus on vulnerable and disadvantaged groups and persons as well as on rights holders. It summarizes the participatory planning process leading to the identification of alternative livelihoods arrangements for affected individuals and community groups. It describes agreed plans for individual or collective livelihood improvement (including livelihood strategy formulation and design, identification and design of options, scheduling and financing, identification and negotiation of required partnerships). The LRP identifies any access arrangements for limited resource uses, as well as cultural, traditional, or religious uses. It covers transitional support arrangements to ensure income and food security where needed during the livelihood restoration and improvement process.¹⁵ It includes administrative, financial, grievance review, monitoring, and other arrangements for implementation of the agreed activities.

37. LRPs and PFs need to effectively enable communities to identify access regimes that avoid impacts and/or provide mitigation or compensation measures for those adversely affected. Once options are identified, it is important to undertake a feasibility assessment to ensure these are implementable and to avoid unrealistic expectations. Such measures should be accompanied by clear participatory implementation arrangements, institutional responsibilities, schedule, budget and assigned resources, Grievance Mechanism (GM) and participatory monitoring and evaluation, including indicators regarding the agreed livelihood objectives. The timing of agreements and activities can be flexible but should be aligned with the implementation of access restrictions and/or include transitional support to avoid impoverishment and transitional hardships. If an LRP or PF is prepared or finalized during project implementation—with related timebound actions included in the ESCP—it is advisable to provide clear milestones that ensure that the necessary mitigation measures can be identified and implemented (i.e., they are agreed, publicized, operationalized, and funded) before the access restrictions supported by the project take effect.

38. If the Borrower cannot commit to a compensation and/or livelihood restoration approach consistent with ESS5 (whether a PF is used or not), the Bank reconsiders whether the project design is viable and whether other viable alternatives or interventions are available.

¹⁴ ESS5, Annex 1.C., paragraph 33(c).

¹⁵ Alternative sources of supply may also need to be provided where use of vital resources (drinking water, livestock fodder, fuelwood) is precluded. Rights to, and terms for, continued partial use may also be adjusted during the transition period (e.g., use of water sources, seasonal livestock movement, or rights to forest products).

39. It is important to consider which individuals or groups adversely affected by access restrictions will take part in the participatory process under the PF and/or LRP and which will benefit from mitigation or compensation measures, such as livelihood restoration. As discussed above, affected people vary greatly in their circumstances. For example, some have customary or legal rights to access the PCA and its resources (e.g., IPs/SSAHUTLCs, pastoralists, nomadic groups, or other traditional communities) while others access the PCA illegally. Some are covered by licenses or distinct access regimes or generate large profits. Some come from the PCA's vicinity and others from further away. Some have historical ties to the PCA while others are comparatively recent migrants to the area. Some are poor or otherwise vulnerable and some are better off. Some depend heavily on the PCA's resources for their subsistence or culture while others are only occasional users of the PCA's resources. Some are individuals and others are organized in groups, associations, small enterprises, or large corporations. Some make infrequent and low-impact use of the PCA's resources while others make intensive and unsustainable use of them, using environmentally destructive methods. Some carry out activities in PCAs that constitute civil violations under national law while others engage in criminal activities, sometimes with the backing of organized criminal organizations. A review of these varied circumstances will assist in identifying which groups should take part in the PF and/or LRP process and which should receive some form of support under the project. Given the wide range of possible projects and country contexts, the Borrower should consult with adversely affected groups and propose an approach for the Bank's no-objection, informed by the circumstances of the groups affected by access restrictions, Bank policy, and applicable national regulations and international law. Adversely affected groups should be able to access the project GMs to raise questions or concerns regarding their participation in the process or the support received. **Annex VII provides further guidance for preparing LRPs and PFs. Terms of reference for PFs and LRPs are found in Annexes VIII and IX, respectively.**

Issue 5: Physical Resettlement

40. The physical relocation or displacement of people living inside a PCA, including potentially large communities, may be induced by the project (including, for example, where relocation of residents from the PCA is required under national conservation laws), by other government initiatives necessary to achieve the project objectives, or by unrelated activities that could still present risks to those communities or the project. It may also pre-date the project and Bank due diligence, in which case the Bank should determine whether such resettlement activities were undertaken or initiated in anticipation of, or in preparation for, the project. Consistent with ESS5, where the project induces or risks inducing physical relocation, the Bank should aim to avoid or minimize such impacts where possible, including through careful demarcation and in-situ regularization of households and communities residing legitimately in the PCA. If involuntary resettlement cannot be avoided, the Bank requires the Borrower to prepare an RPF/Resettlement Plan (RP). Displaced individuals should also be given an opportunity to take part in LRP/PF arrangements to the extent they face impacts on PCA resources not fully addressed in the RPF/RP. Where there may be physical relocation or displacement that is not project-induced, the Bank assesses how these may affect perceptions of the project and identifies ways to manage such risks.

Issue 6: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (IPs/SSAHUTLCs)

41. IPs/SSAHUTLCs manage or have tenure rights over large parts of the world's terrestrial PCAs. They often depend upon the natural resources of PCAs for their food systems, livelihoods, and cultural and spiritual practices that are integral to their traditional knowledge, ways of life, and resilience. At times, their access to and occupation of certain spaces may be seasonal or temporary in nature, yet critical as part of broader livelihood and resilience systems. In other cases, IPs/SSAHUTLCs may move into or near

an area during project implementation for a range of reasons, including possibly as a result of forced displacement from other areas. The project, through the creation or alteration of PCAs, and/or changes in resource access rules, can have profound impacts on IPs/SSAHUTLCs if these changes occur without their meaningful participation in decision-making and/or Free, Prior, and Informed Consent (FPIC), as applicable. Engagement with affected and/or beneficiary IPs/SSAHUTLCs will often require a dedicated process that is agreed upon with them and builds upon their socio-cultural norms and ways of engaging and respects their unique governance and organizing representative structures. The involvement of IPs/SSAHUTLCs and project impacts on them should be addressed in the PF, the SEP, the LRP and an Indigenous Peoples Planning Framework (IPPF) or Indigenous Peoples Plan (IPP), consistent with ESS7.

42. Among other issues, the Bank should consider whether IPs/SSAHUTLCs, as defined in ESS7, are present within or have collective attachment to the PCAs or buffer zones within the project area, and how the project will affect the ability of IPs/SSAHUTLCs to access the PCA, including lands which they inhabit or where they have customary claim, and/or for social, spiritual, cultural, or livelihoods purposes. Special considerations should be given to IPs/SSAHUTLCs living in voluntary isolation or initial contact. The Bank should also consider whether the country's legal framework recognizes IPs/SSAHUTLCs as distinct socio-cultural groups with collective rights or other unique access, use and management rights to PCAs and their buffer zones. Special attention should be paid to the project's consultation modalities, including the circumstances under ESS7 that require the FPIC of IPs/SSAHUTLCs. These include situations where project activities will have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation. An IP/SSAHUTLC Checklist to screen for specific risks and impacts, guide consultation and participation processes, and offer additional resources related to the roles IPs/SSAHUTLCs in PCA governance is contained in **Annex X**.

Issue 7: Vulnerable Groups

43. There may be vulnerable groups among local communities and project-affected people that require particular attention, including forest dwellers, forest-dependent people, migrants, and other minorities and individuals and groups vulnerable on the basis of, for example, their ethnicity, age, or sexual and gender identity. Their vulnerability may call for special due diligence and differentiated mitigation measures beyond those for other adversely affected individuals or groups. These assessments and measures should be captured in the Borrower's social assessment, SEP, GM, PF, LRP, and other relevant E&S documents.

Issue 8: Human-Wildlife Conflict

44. Communities living in and around PCAs can be subject to human-wildlife conflict. Such encounters often affect livelihoods (e.g., through wildlife raiding crops, attacking livestock, injuring people, or damaging property) and can negatively influence community perceptions of wildlife and support for PCAs. In retaliation, people may kill or injure problem animals. Human-wildlife conflict can be exacerbated by PCA management objectives, which often aim to increase wildlife populations, and can increase the risk of livelihood impacts and amplify other risks. These risks and mitigation measures should be captured in appropriate E&S assessments and documents, such as the Borrower's social assessment, E&S management plan, PF, LRP, SEP, and GM, as well as government documents, such as PCA management plans.

Issue 9: Stakeholder Consultations

45. Stakeholder engagement is conducted in two parts: (i) consultations with project-affected stakeholders clearly mapped and laid out in the SEP and LRP/PF/RPF; and (ii) engagement with other, broader stakeholders, who are not adversely affected by the project but have other interests in it, who are

included in the SEP and any other relevant E&S document. Stakeholder engagement, which is especially valuable in situations involving historical sensitivities and tensions, may take many forms beyond just consultations, including accessible and timely sharing of information and participatory planning and decision-making. Such engagements should include all relevant stakeholders, including those who access the PCA only during certain seasons, even where the geographical areas or the number of affected people is large, and those who take part in PCA management, including personnel involved in the enforcement of PCA rules. This wide range of relevant stakeholders and their accessibility needs and constraints (e.g., languages, remoteness, cultural differences) should be reflected in the SEP and GM under ESS10 and in the PF and LRP under ESS5. Where IPs/SSAHUTLCs are involved, these consultations should also be consistent with ESS7, including obtaining FPIC where required (see **Annex X**). The SEP, LRP, and the PF (as well as the IPP/IPPF and RP/RPF, where applicable) should be well-coordinated, and the Bank and Borrower should be clear on which communities or groups are covered by which document. Reporting on stakeholder engagement progress, community agreements, and the results of participatory processes should be a part of the project's regular monitoring reports/systems and the process laid out in the PF, where applicable.

Project Management, Grievance Mechanisms, and Incident Reporting

Issue 10: Bank Supervision and Adaptive Management

46. The Bank and the Borrower should supervise the entire area of project activities and impacts in a manner commensurate with the risks. The Bank should ensure that Bank Task Teams and the Borrower have adequate resources to do so. Given the large areas sometimes involved, and the challenges to access them, project implementation arrangements may need to include a mix of reporting arrangements and channels, including periodic monitoring and reporting by the Borrower, and reports from another government agency, contractors, community groups and/or IP/SSAHUTLC organization partners, or NGOs. These arrangements should be set out in the ESCP and appropriately resourced. The use of technology, including remote sensing, can also be considered to enhance visibility in hard-to-access areas, provided that associated risks are addressed. Media screening and use of community liaisons may also supplement implementation support.

47. Careful supervision starts by confirming the Borrower's ability to manage the project as agreed, including implementing the mitigation measures throughout the implementation period and across the whole project area, and overseeing the activities of all entities involved in the project. At the project planning stage, the Bank should agree with the Borrower on the latter's supervision plan and develop its own supervision plan and the respective budgets commensurate with the factors present in the project. The large areas, remote locations, diverse stakeholders, and potential use of third-party and community monitoring and other issues inherent to projects involving PCAs all call for active Borrower and Bank management throughout the implementation period.

48. If complaints, grave incidents, or other unusual developments arise, they should be captured in Borrower reports to the Bank and in project implementation status reports (ISRs), in the non-disclosable section if necessary, and used to inform adaptive management. For example, migration patterns may emerge that lead to additional stresses on PCA resources or tensions with local communities. As another example, floods, droughts, or fires might alter ecosystems, patterns of invasive species, or social dynamics. The Bank works with the Borrower to adopt additional measures to address these developments proactively or to respond quickly and comprehensively, including through prompt additional field visits by Bank staff to the specific locations that are referred to in complaints/incident reports. The Bank and the Borrower also arrange additional in-house or outside technical expertise, investigations, and allocation of

additional resources to ensure appropriate adaptive response. In the case of complaints and incidents, the Bank assesses any concerns carefully, as links to the project may not be apparent at first. Incidents and claims may require adoption of follow-up actions to be supervised specifically until completion and closure. Post incident, the Bank and the Borrower need to review the project supervision plans and agree on the need for stepped up efforts, with additional in-house or outside experts in specific fields, additional reporting, or field visits to be included in the ongoing monitoring and supervision activities for the project.

Issue 11: Grievance Mechanisms and Incident Reporting

49. The project’s GM should be accessible to all parties potentially affected by project activities, such as park management and access restrictions, civil works, sustainable resource use, and the enforcement of agreed PCA rules, even if the geographical area or population base is large. Bank due diligence and GM design should also account for possible retaliation against community members, IPs/SSAHUTLCs, and civil society advocates, which can be heightened in cases where the GM is run by a government entity with a mandate to enforce PCA rules or the complaint relates to enforcement. In such cases, the Bank confirms that the necessary checks and balances are in place and that the GM is consistent with Bank standards and offers confidential channels to handle complaints. The design of the GM, including measures to ensure its accessibility (e.g., languages, oral channels), needs to reflect the inputs of stakeholders and be integrated with the SEP, PF, incident reporting protocol, and other project documents. Borrowers may choose to establish separate GMs to cover the full range of grievances that may arise under the project. For example, one GM could address concerns related to access restriction or physical relocation, as described in the PF, LRP and RP, and another GM could address other project-related grievances, as described in the SEP.

50. Specific challenges may hinder the optimal functioning of GMs in PCAs. The GM should be capable of addressing these issues and supported by specialists with a nuanced understanding of PCA management and local socio-ecological contexts. In addition, GM implementation and the resolution of disputes can be strengthened by inclusive communication campaigns, the appointment of community-liaison officers, enhanced monitoring measures and reporting, partnering with local organizations operating in remote communities, the efficient use of customary feedback and conflict resolution systems, improved referral systems for those issues that cannot be addressed under the project, strengthened confidentiality and anti-retaliation policies, and independent and community oversight. See **Annex XI** for further guidance on **Designing and Implementing Grievance Mechanisms in PCA Projects**.

51. Despite the precautionary measures in this Note, incidents may still occur, including violations of the provisions of the E&S documents by any of the stakeholders, or illegal access or attempted access to the PCA by other external entities who are not a part of the governance and implementation arrangements. Therefore, before project activities begin, the Bank ensures that the Borrower has established systems to track and report such incidents if they occur. The Bank and Borrower should agree on: (i) the types of incidents subject to reporting and the level of information necessary when reporting an incident; (ii) a process and timeframe to respond to and report such incidents to the Bank; (iii) arrangements to regularly monitor for the possible increase in the frequency, range and/or severity of violent incidents resulting from project activities (e.g., enhanced patrols, better demarcation or enforcement of PCA boundaries, increase in seizures of property); and (iv) verification that follow-up actions are complete. These details should be documented in the Operational Manual and referenced in the ESCP’s section dedicated to incident reporting. **Annex XII** includes an **Illustrative Protocol for Borrower Reporting to the Bank on Project-Related Incidents**.

Annex I. Relevant Bank Policies and Guidance

This summary highlights key areas of Bank policy and guidance relevant for Protected and Conserved Area (PCA) projects. It is not exhaustive.

Environmental and Social Framework

Environmental and Social Policy

- Paragraph 4: requiring Bank due diligence into project-related impacts related to community safety, threats to human security, and land and natural resource use and related conflict or contestation);
- Paragraphs 10–11: describing associated facilities and activities;
- Paragraph 16: requiring Bank consideration of capacity of the Borrower and other project-implementing entities to ensure compliance with Environmental and Social Standards (ESSs), and setting out factors for setting timeframe and manner of project implementation;
- Paragraph 17: requiring the Bank to ensure that the Borrower carries out project activities that may cause material adverse environmental and social (E&S) risks and impacts only once the Borrower has completed the corresponding plans and mitigation measures in accordance with the Environmental and Social Commitment Plan (ESCP);
- Paragraphs 30–31, 50: requiring the Bank to gather enough information about the risks and impacts of the project to assess whether it is capable of being developed and implemented in accordance with the ESSs, to assist the Bank in deciding whether to support the project and how E&S risks and impacts will be addressed, and to inform stakeholder consultations;
- Paragraph 51: requiring the Bank to disclose documentation relating to the E&S risks and impacts of High Risk and Substantial Risk projects prior to project appraisal in sufficient detail to inform stakeholder engagement and Bank decision-making;
- Paragraph 52: requiring that for High Risk and Substantial Risk projects, the Bank will indicate in the Project Appraisal Document the project-related documents that will be prepared and disclosed after Board approval, with details and timing for delivery of the document set out in the ESCP, as appropriate.

ESS1

- Paragraph 3, fn.1: requiring the Borrower to ensure project is implemented in accordance with ESSs, even for entities not directly implementing the project;
- Paragraph 23: requiring Borrower assessment in an integrated way of all relevant direct, indirect, and cumulative E&S risks and impacts;
- Paragraph 26: requiring consideration of the country's national laws, regulations, institutional capabilities, and obligations directly applicable to the project under relevant treaties and agreements;
- Paragraph 27: describing the mitigation hierarchy;
- Paragraph 28: requiring the Borrower to assess project impacts related to community safety, threats to human security, and land and natural resource use and related conflict or contestation);

- Annex 1, paragraph 11: describing institutional assessment and strengthening programs that may be appropriate where the Bank concludes that the Borrower has inadequate legal or technical capacity to carry out E&S assessment functions.

ESS4

Paragraphs 24–27: governing use of public or private security personnel hired by the Borrower to safeguard personnel and property.

ESS5

- Paragraphs 4(c), 4(f), 4(h): describing restrictions on land, land use, access to natural resources, or use of other resources in connection with project implementation;
- Paragraph 21(d): requiring the Borrower to prepare a plan, proportionate to the risks and impacts of the project, for projects that may impose changes in land use that restrict access to resources in legally designated parks or protected areas or other common property resources on which local people may depend for livelihood purposes. The plan will establish a participatory process for determining appropriate restrictions on use and set out the mitigation measures to address adverse impacts on livelihoods that may result from such restrictions;
- Paragraph 31: requiring the Bank to ensure that any involuntary resettlement is carried out in a manner consistent with basic principles of due process, including avoidance of unnecessary, disproportionate, or excessive force;
- Paragraphs 33: in the case of projects affecting livelihoods or income generation, requiring the Borrower’s plan to include measures to allow affected persons to improve, or at least restore, their incomes or livelihoods.
- Paragraph 35(b): for persons whose livelihoods are natural resource-based and where project-related restrictions on access envisaged in paragraph 4 apply, requiring measures to be implemented to either allow continued access to affected resources or to provide access to alternative resources with equivalent livelihood-earning potential and accessibility. Where common property resources are affected, benefits and compensation associated with restrictions on natural resource usage may be collective in nature;
- Annex 1, paragraph 1: where restrictions on access to legally designated parks and protected areas are involved, the plan may take the form of a “process framework;”
- Annex 1.C.: setting out the content of a PF.

ESS7

- Paragraph 19: when situations arise in which projects potentially affect remote groups with limited external contact, also known as peoples “in voluntary isolation,” “isolated peoples” or “in initial contact,” requiring the Borrower to take appropriate measures to recognize, respect and protect their land and territories, environment, health, and culture, as well as measures to avoid all undesired contact with them as a consequence of the project. The aspects of the project that would result in such undesired contact will not be processed further;
- Paragraph 24: requiring Free, Prior, and Informed Consent (FPIC) of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (IPs/SSAHUTLCs) where the project (a) has adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation, (b) causes relocation of IPs/SSAHUTLCs from land and natural resources subject to traditional ownership or under customary use or occupation; or (c)

has significant impacts on IPs/SSAHUTLCs’ cultural heritage that is material to the identity and/or cultural, ceremonial, or spiritual aspects of the affected IPs/SSAHUTLCs’ lives;

- Paragraphs 25–28: defining FPIC and related processes and requirements.
- Paragraph 29: requiring a plan for the legal recognition of IP/SSAHUTLC ownership, occupation, or usage for projects contingent on acquiring or establishing legally recognized rights to lands and territories that IPs/SSAHUTLCs have traditionally owned or customarily used or occupied;
- Paragraph 30: requiring FPIC where the Borrower proposes to locate a project or commercially develop natural resources on land traditionally owned by or under the customary use or occupation of IPs/SSAHUTLCs, and adverse impacts can be expected;
- Paragraph 31: requiring FPIC for relocation from traditional lands and natural resources;
- Paragraph 32: prioritizing avoidance of significant impacts on natural heritage and requiring FPIC where such impacts are unavoidable.

ESS8

- Paragraphs 24–26: describing natural features with cultural significance;
- Paragraphs 29–30: describing use of cultural heritage of project-affected parties for commercial purposes, including requirements to inform, consult, mitigate, and provide for fair and equitable sharing of benefits.

ESS10

- Paragraph 6: requiring Borrowers to engage with stakeholders through the project cycle, as early as possible and in a timeframe that enables meaningful consultations on project design;
- Paragraph 7: requiring that engagement be free of manipulation, interference, coercion, discrimination, and intimidation;
- Paragraph 20: requiring information to be disclosed in relevant languages in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project;
- Paragraph 27: where feasible and suitable for the project, requiring the GM to utilize existing formal and informal GMs, supplemented as needed with project-specific arrangements;
- Paragraph 28: requiring the Borrower to designate specific personnel to be responsible for the implementation and monitoring of stakeholder engagement activities.

Other Relevant Policies and Directives

Bank Policy, Investment Project Financing

- Paragraph 4: describing Bank assessment of proposed project considers E&S considerations and related risks;
- Paragraph 5: describing Bank assessment of needs and capacity of Borrower and any project implementing entity;
- Paragraph 20: describing Bank implementation support, including updates to risks and related management measures;

- Paragraph 27: describing corrective measures to be imposed where Borrower or project participant does not comply with contractual obligations.

Bank Policy, Development Cooperation and Fragility, Conflict, and Violence

- Paragraphs 13–16: requiring consideration of risk factors for engagement with security sector or military actors, including project implementation by security sector or military actors;
- Paragraph 15: prohibiting the financing of arms or weapons and military equipment, or infrastructure;
- Paragraph 16: requiring risk assessment for engagement with the security sector, including consideration of the relevant institution’s purpose and function, capabilities, track record and accountability mechanisms, the strength of oversight arrangements, the presence of partners with relevant technical expertise, and the risk of funds being diverted or advice being used for political or other non-development purposes. Requiring also that the activities and related expenditures undertaken by security or military agencies be productive and confer clearly defined development benefits to civilians in order to qualify for Bank financing.¹

Bank Directive/Procedure, Environmental and Social Directive/Procedure for Investment Project Financing

- Sec. III.A, paragraph 2: requiring the Bank to undertake its own due diligence of proposed projects proportionate to the nature and potential significance of the E&S risks and impacts and, as and where required, to support the Borrower to carry out early and continuing engagement and meaningful consultation with stakeholders, in particular affected communities, and to provide project-based GMs;
- Sec. III.C., paragraph 5; Sub-Sec. III.6: requiring the Bank to monitor E&S risks and Borrower compliance with E&S requirements throughout the project cycle and revise the E&S risk classification, E&S performance ratings, and E&S Commitment Plan (ESCP) as necessary, including based on risks or impacts not previously foreseen or anticipated;
- Sub. Sec. III.1, paragraph 2: requiring the Bank to support the Borrower in determining the process to be followed, and the different methods and tools to be used by the Borrower to carry out the E&S assessment and to document the results of such an assessment;
- Sub. Sec. III.2, paragraph 3: requiring the Bank to approach risks and impacts to disadvantaged or vulnerable groups in accordance with the Bank Directive, Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups;
- Sub. Sec. III.6, paragraph 6, and Annex VI: requiring the Bank to prepare a post-closure action plan where E&S measures and actions that were previously agreed have not been fully implemented.

Bank Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups

- Paragraph 4: requiring the Bank to ensure that the Borrower’s Stakeholder Engagement Plan (SEP) identifies and includes differentiated measures for disadvantaged or vulnerable individuals or groups, and that the Borrower has engaged and consulted with such individuals and groups in accordance with the SEP;

¹ Bank engagement with the criminal justice sector is governed by the 2012 Legal Note on Bank Involvement in the Criminal Justice Sector (see Guidance and Related Resources below).

- Paragraph 5: requiring the Bank to undertake due diligence for the project with respect to disadvantaged or vulnerable individuals or groups, including by reviewing assessments conducted by the Borrower and reviewing information about the project’s risks to and impacts on such individuals or groups;
- Paragraph 6: requiring the Bank to ascertain whether appropriate mitigation measures have been incorporated into project design and documented in relevant project documents so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable, and they are not disadvantaged in sharing any development benefits resulting from the project. This due diligence contributes to the Bank’s decision-making as to whether or not to proceed with the proposed project.

OP 7.50 and BP 7.50 – Projects on International Waterways

- The applicability of this policy should be determined as early as possible in the project cycle. OP 7.50, paragraph 1 outlines the types of international waterways covered by this policy. Activities that use or risk polluting water as well as detailed design and engineering studies, water resources surveys or feasibility studies related to the use or potential pollution of water may trigger policy application if they concern international waterways (see paragraphs 2 and 7(b) of OP 7.50). OP/BP 7.50 does not provide any *de minimis* threshold for the amount of water used and impact in order for the policy to apply;
- For such projects, the Borrower or beneficiary state is required to notify all other riparians unless an exception to this requirement is justified under paragraph 7 of the policy.

OP 7.60 – Projects in Disputed Areas

- Projects involving disputed areas must be identified and addressed early to avoid prejudicing any party’s claims;
- The Bank may support a project in a disputed area if the concerned governments agree it can proceed without prejudice to their claims;
- Before approval, Bank staff must confirm either that: (i) other claimants have no objection; or (ii) special circumstances warrant Bank support for the project despite objections;
- Special circumstances include a determination that the project will not harm other claimants’ interests or that a conflicting claim lacks international recognition or is not being actively pursued;
- All project documents must include a disclaimer stating that Bank support for the project does not imply any judgment on the legal status of the territory or prejudice final determination of the parties’ claim.

Guidance and Related Resources

- [Bank Guidance, Bank Financing of Fisheries Enforcement Activities: International Law Aspects](#)
- [Good Practice Note on Assessing and Managing the Risks and Impacts of the Use of Security Personnel](#)
- [2012 Legal Note on Bank Involvement in the Criminal Justice Sector \(2012 Legal Note\)](#)

- [Engagements with the Security Sector and Non-State Actors, Q&A for Operational Staff](#) (Apr. 4, 2025) (referred to in the GPN as the FAQs on Security Sector Engagements)
- [Good Practice Note on Animal Health and Related Risks](#)
- [Good Practice Note on Use of Third-Party Monitoring](#)
- [Directive on Managing Environmental and Social Risks and Impacts for the Emission Reductions Programs under the Forest Carbon Partnership Facility and the BioCarbon Fund Initiative for Sustainable Forest Landscapes.](#)
- [Tip Sheet: Conducting Meaningful Stakeholder Engagement throughout the Project Cycle](#)
- [Grievance Mechanism Checklist](#)

Annex II. Proposed Template for a Protected or Conserved Area Profile

This template can be used and adapted to screen each Protected or Conserved Area (PCA) under the project against the main parts of the GPN early in project preparation. Each PCA Profile informs which areas require further due diligence in accordance with the principle of proportionality. It can also be drawn upon to draft the Environmental and Social Review Summary and Project Appraisal Document (PAD).

Protected Area Overview	Key Resources in the GPN
<input type="checkbox"/> Name and International Union for Conservation of Nature (IUCN) Category (where relevant): What is the name, status, and classification of the PCA? Is it a legally designated protected area or another type of protected or conserved area?	- Sec. II (projects concerned)
<input type="checkbox"/> PCA and Project Boundaries: What are the boundaries of the PCA and its buffer zones? How do they relate to the project area? Are there plans to expand the PCA?	- Issue 1. - Annex V (illustrative assessments and measures)
Governance & Legal Framework	Key Resources in the GPN
<input type="checkbox"/> Relevant Institutions: Which entities have the authority to manage the PCA? Do they have the capacity to carry out project activities in accordance with Bank policy requirements? Under which laws and regulations is the PCA created and managed? Are the terms of the PCA management plan consistent with project objectives?	- Issue 2. - Annex III - Annex V
<input type="checkbox"/> Relevant Laws, Rules, and Operating Procedures: Do any project activities affect land or resource rights or claims, especially with respect to traditional, indigenous, local, or vulnerable groups? Are PCA rules enforcement activities in the PCA a project activity, an associated facility, or a direct, indirect, or cumulative impact of the project? Do other PCA rules enforcement activities in the PCA present risks to communities that could affect perceptions of the project and the Bank?	- Issue 3. - Annex III - Annex V - Annex VI
Social & Stakeholder Dimensions	Key Resources in the GPN
<input type="checkbox"/> Access Restrictions: Who accesses the PCA, when, and for what uses (e.g., hunting, grazing, fishing, navigation, migration, cultural or religious purposes)? Would enhanced restrictions of access to the PCA adversely affect the livelihoods and culture of existing PCA users? Does the Borrower have the technical capacity, regulatory framework, and political commitment to develop and enforce access rules for the PCA in a manner that is participatory and inclusive of the views of affected communities?	- Issue 4. - Annex V - Annex VII - Annex VIII - Annex I
<input type="checkbox"/> Physical Resettlement: When, if at all, did land acquisition or resettlement previously occur in the PCA? Do claims, tensions, or conflicts remain from such resettlement? Is any land acquisition or resettlement planned during project implementation?	- Issue 5. - Annex V
<input type="checkbox"/> IPs/SSAHUTLCs: Are any Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (IPs/SSAHUTLCs) present or do they have rights, claims or an interest in the project area?	- Issue 6. - Annex X - Annex V

Do any live in voluntary isolation? Will project activities require the Free, Prior, and Informed Consent (FPIC) of IPs/SSAHUTLCs?

- | | |
|--|--------------------------------------|
| <input type="checkbox"/> Vulnerable Groups: Are vulnerable groups (such as forest dwellers, forest-dependent people, migrants, minorities, etc.) present or dependent on resources in the project area? | - Issue 7.
- Annex V |
| <input type="checkbox"/> Human-Wildlife Conflict: Is there a history or risk of human-wildlife conflict in and around the PCA? Are such conflicts likely to result from or be exacerbated by project activities? | - Issue 8.
- Annex V |
| <input type="checkbox"/> Stakeholder Engagement: What community engagements have already occurred or are planned in or near the PCA in relation to the project, such as in the context of a PCA management plan? Is there a history of cooperation or tension and distrust between local communities and PCA authorities? | - Issue 9.
- Annex V
- Annex X |

Project Management, Grievance Mechanisms & Incident Reporting

Key Resources in the GPN

- | | |
|---|--|
| <input type="checkbox"/> Bank Supervision and Adaptive Management: Do the Bank and Borrower have the capacity, plans, and tools to supervise all project activities and impacts across the PCA? | - Issue 10.
- Annex V |
| <input type="checkbox"/> Grievance Mechanism and Incident Reporting: Is there a pattern or history of tensions or conflicts between local communities or other groups and PCA authorities? What effective and trusted Grievance Mechanism (GM) is available or planned for communities to raise concerns related to the project and PCA? Is there a system in place for the Borrower to report to the Bank all project-related incidents, including violent incidents related to PCA management? Is there a system to respond when incidents do occur? | - Issue 11
- Annex V
- Annex XI
- Annex XII |

Annex III. Institutional Assessments for PCA Rules Enforcement Functions

1. As usual in all Bank-financed projects, the Bank assesses the capacity of the relevant entities to carry out project activities in accordance with Bank policies. This Annex focuses on the part of that assessment dedicated to the Protected and Conserved Area (PCA) rules enforcement functions of those entities. Enforcement refers to the actions taken to address non-compliance with PCA rules. The authority to enforce PCA rules is usually spelled out in national law, local regulations, and the rules of the PCA itself. Depending on the project and PCA, enforcement may be carried out by personnel affiliated with government, the private sector, or the local community. Personnel may work under the authority of the PCA management entity or another jurisdiction in the area (e.g., police, coast guard, military).

2. As shown in **Table III.1** and the decision tree (**Figure III. 1**) that follows, what kind of due diligence of enforcement entities to conduct depends on the project, and its depth is proportionate to the risks. Most projects involving PCAs include some degree of financing of PCA management. And many projects involving support for PCA management involve some support for the enforcement of PCA rules. The Bank does not provide financing for arms, weapons, or military equipment or infrastructure. Nor does the Bank provide advice on security or military policy, which is outside its technical competence and comparative advantage. But the Bank may and regularly does finance other types of support to PCA management entities with a mandate to enforce PCA rules. In fact, financing activities related to PCA rules enforcement is sometimes necessary to achieve the Project Development Objective (PDO) and support the country's priorities. Where enforcement activities are supported by the project, they require heightened due diligence, including a Borrower-led institutional assessment of those enforcement entities, which the Bank reviews to ensure that they operate in accordance with good international practice (right column of the table). The same type of assessment is needed where PCA rules enforcement activities are an "associated facility" under the Environmental and Social Framework (ESF) or are a direct, indirect, or cumulative impact of project activities. Where engagements involve the security/military sector or criminal justice agencies, the Bank carries out a risk assessment as required under the Policy on Fragility, Conflict, and Violence (FCV Policy) and/or the 2012 Criminal Justice Note and related guidance.¹ Such assessments may reveal that gaps cannot be addressed within the scope of the project, that the counterparts are not willing to share the necessary information, or that the proposed project involves support for the police or military in a way that exceeds the Bank's mandate. In those cases, the project may need to be redesigned. Where PCA rules enforcement entities are operating in the project area but do not fall into one of the situations above, the Bank conducts due diligence on the risks to communities related to the enforcement practices of those entities that could affect perceptions of the Bank and the project (middle column of the table).

3. The following illustrative factors can be considered to determine whether a PCA rules enforcement activity is a project activity, an associated facility, or a direct, indirect, or cumulative impact of the project:

- Personnel are not financed by the project but carry out project activity with counterpart financing (could be indicative of project activity);
- Personnel regularly patrol with project-financed entities in pursuit of project activities or objectives (could be indicative of project activity or associated facility);
- Personnel newly or more frequently patrol areas that became more accessible as a result of the project (could be indicative of direct or indirect project impact);

¹ FCV Policy, paragraph 16; FAQs on Security Sector Engagements; 2012 Criminal Justice Note.

- Personnel target certain violators of PCA rules more frequently or effectively as a result of the project (could be indicative of direct or indirect impact);
- Personnel are needed by project implementing entities to deter or respond to violations of PCA rules and achieve project objectives (could be indicative of associated facility);
- Personnel regularly use Bank–financed equipment and supplies, such as patrol boats or ranger vehicles, as part of PCA rules enforcement activities (could be indicative of project activity or direct or indirect impact); and
- Personnel report to project implementing entities and are deployed for PCA rules enforcement purposes at the request or direction of project implementing entities (could be indicative of project activity or direct or indirect impact).

4. The Bank’s lack of contractual leverage over non-project implementing entities is not a definitive factor in making this assessment. However, if an activity is associated, the Borrower ensures ESF compliance to the extent of its influence or control.

Table III.1: Due Diligence Required in Different Project Circumstances

	No focus on PCA management	Focus on PCA management, but not PCA rules enforcement	Focus on PCA management, including support for PCA rules enforcement
Type of project-related support for PCA rules enforcement	Project is financing activities in or near PCA that are not focused on PCA management.	Project is financing PCA management without a focus on PCA rules enforcement. ¹ PCA rules enforcement is operating in the PCAs in the project area but is not a project activity, an “associated facility,” or a direct, indirect, or cumulative impact of the project. ²	Project is financing PCA management, including support for the PCA rules enforcement functions of an institution, such as ranger patrolling equipment. Or PCA rules enforcement activities are an “associated facility.” Or PCA rules enforcement activities are a direct, indirect, or cumulative impact of the project.
Illustrative activities financed by the project	Visitor center or research lab where PDO aims to improve scientific research.	Beacons and fences, ³ roads, management plans without PCA rules enforcement dimensions, and equipment that cannot be used for PCA rules enforcement purposes.	Ranger posts, enforcement-related training, management plans with enforcement dimensions, allowances/salaries for personnel enforcing PCA rules, and any equipment that could be used for PCA rules enforcement purposes (e.g., communications equipment, cameras, knives, drones, monitoring equipment, boats, vehicles, uniforms).
Application of Bank policy to PCA rules enforcement activities	N/A	No, but PCA rules enforcement presents risks to local communities that could also affect perceptions of the project or the Bank	For project activities: Yes For direct, indirect, and cumulative impacts: Yes For associated activities: Yes, to the extent of the Borrower’s influence or control. ⁴

¹ Some PCA management entities have both enforcement and non-enforcement functions. The institutional and operational lines between these functions may be blurry. The Bank should carefully consider whether it can practically and credibly distinguish its support to that entity from its PCA rules enforcement functions. Where such distinction is not possible, the Bank treats the entity as a law enforcement entity.

² In some cases, PCA rules enforcement entities that do not work for the project implementation unit (PIU) will conduct joint patrols with the PCA agencies supported by the project. They may work, for example, for another ministry, the police, or the military. Based on the nature of these agents’ work and their relation to project activities, the Bank should determine whether such PCA rules enforcement entities are unrelated to the project, a project activity, an associated facility, or a direct, indirect, or cumulative impact of the project.

³ Whether financing of beacons and fences amounts to support for rules enforcement should be carefully considered based on the specifics of the project. For example, where the project finances only the rehabilitation of existing beacons and fences and provides no other support for the demarcation and enforcement of PCA boundaries or rules, the project likely would not be considered to support enforcement. If, however, the project finances beacons or fences to clarify or reinforce contested PCA boundaries, rules enforcement would likely be considered a project activity or a direct or indirect impact of the project.

⁴ See Environmental and Social Policy, paragraph 11.

Table III.1: Due Diligence Required in Different Project Circumstances

	No focus on PCA management	Focus on PCA management, but not PCA rules enforcement	Focus on PCA management, including support for PCA rules enforcement
<i>Borrower responsibility</i>	No assessment.	Provide information to the Bank.	Conduct institutional assessment and implement gap-filling measures.
<i>Bank responsibility</i>	No assessment.	Conduct due diligence into risks to community that could also affect perceptions of the project and the Bank to inform Bank decision on whether to proceed with the project and how to manage these residual risks.	Environmental and Social Accountability and Decision Making (E&S ADM) review and clearance of Borrower institutional assessment and agreement on gap-filling measures. Bank carries out risk assessment in line with FCV Policy and/or the 2012 Criminal Justice Note, as further outlined in the FAQs on Security Sector Engagements.
<i>Disclosure</i>	N/A	Due diligence remains internal to the Bank and informs the Environmental and Social Review Summary and Project Appraisal Document (PAD), which are disclosed.	Borrower discloses the assessment. Consistent with Environmental and Social Standard 4 (ESS4), Borrower shares with the Bank but may withhold from public disclosure sensitive security information. Risk assessments carried out in line with the FCV Policy and/or the 2012 Criminal Justice Note are for internal Bank use only and are not to be disclosed.
<i>Scope of assessment and mitigation measures</i>	N/A	The Bank reviews available information about the PCA rules enforcement entities in the project area, even if they are not implementing agencies of the project, to assess risks to local communities that may affect perceptions of the project and the Bank. The Bank reviews laws and other documents on the PCA's creation and management (including legacy issues), and the governing documents and track record of PCA rules enforcement agencies in the project area (including agency rules, procedures, and codes of conduct available or requested from the Borrower, relationships with communities living in and around the PCA). The Bank also conducts a	The Borrower conducts assessment of the PCA rules enforcement functions of the entities involved—including procedures, rules, staffing arrangements and other capacity, codes of conduct, and existing relationships with communities living in or near the PCA—against good international practice and standards acceptable to the Bank. Bank reviews the assessment along with the legal framework and relevant history/legacy issues for the PCAs as well as the documents regulating the agencies involved in rules enforcement in the PCAs. These assessments may reveal gaps in the way in which the agencies are regulated and /or carry out their rules enforcement activities, their capacity, or gaps in the agreements or arrangements between the Project Implementation Unit (PIU) and other

Table III.1: Due Diligence Required in Different Project Circumstances

	No focus on PCA management	Focus on PCA management, but not PCA rules enforcement	Focus on PCA management, including support for PCA rules enforcement
		<p>media search and stakeholder consultations as appropriate.</p> <p>Such due diligence may reveal a prevalence of threats to PCA resources, conflict, or lack of capacity and accountability to the point that the Bank has to invest in PCA rules enforcement to achieve project conservation objectives, for example, history of violence, FCV context, prevalence of armed criminal groups, legacy issues, threats to subsistence, lack of capacity. In that case, the scope of the project will change and it will move to the column on the right.</p> <p>To manage residual risks, the Bank may consider, for example, putting in place increased monitoring and supervision arrangements, creating an additional event of suspension in the financing agreement, or redesigning the project to the extent that a concerning history of tensions and track record of PCA authorities exceeds the Bank’s risk appetite.</p>	<p>entities involved in enforcing PCA rules under the project. Gaps should be addressed to ensure compliance with Bank policies and mitigate residual risks. Gap-filling measures may include changes to the documents regulating PCA rules enforcement activities, changes to the agreements or arrangements between the PIU and other agencies that engage in enforcement activities, capacity building, and training. It may also require specific obligations to be included in the project legal agreement and/or in the Environmental and Social Commitment Plan (ESCP) and other ESF documents.</p>
<i>Involvement of Bank-financed PCA management and PCA rules enforcement experts</i>	No	Yes, hire/procure experts specialized in good international practice in PCA management and rules enforcement to help conduct the Bank due diligence and to design mitigation measures.	Yes, hire/procure experts specialized in good international practice in PCA management and rules enforcement to help review and complement the Borrower assessment and to design mitigation measures.
<i>Additional guidance</i>	N/A	Points of due diligence in Annex VI .	Illustrative ToRs available in Annex VI .

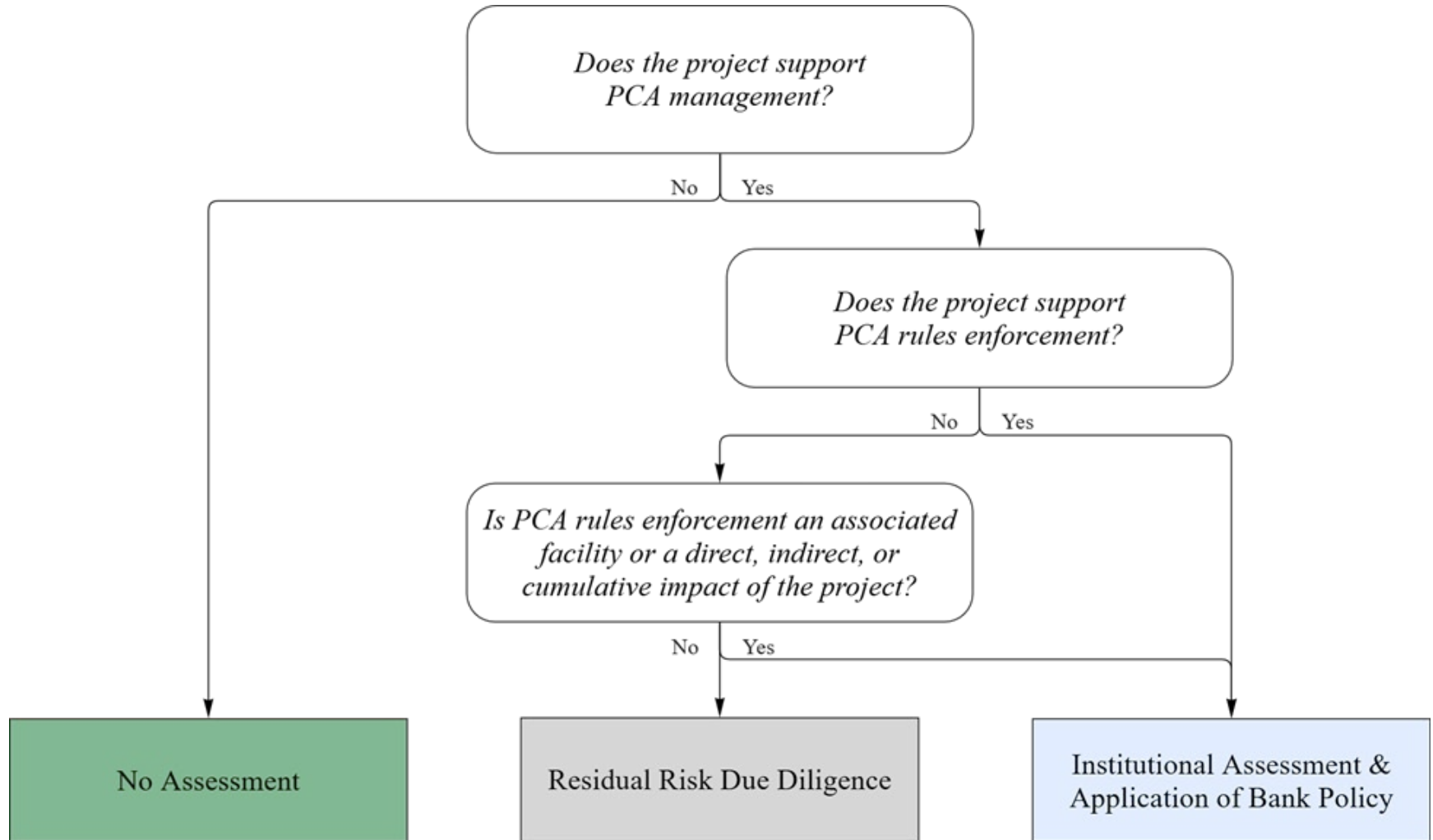


Figure III.1 Due Diligence Steps

Annex IV. Illustrative Degrees of Risk for Each Issue

Annex IV is available online at the following URL:

<https://thedocs.worldbank.org/en/doc/a03b559d93bc8f65b1286313fd7c3448-0290012026/original/pca-gpn-with-annex-iv.pdf>

Annex V. Illustrative Assessments and Mitigation Measures

Annex V is available online at the following URL:

<https://thedocs.worldbank.org/en/doc/410260baa12df0e09a268c0bc6b0d6a9-0290012026/original/pca-gpn-with-annex-v.pdf>

Annex VI. Indicative Terms of Reference for Institutional Assessment of PCA Rules Enforcement Entity Involved in Protected Area Management

Annex VI is available online at the following URL:

<https://thedocs.worldbank.org/en/doc/8f543ad3367f8553465dffabb0299151-0290012026/original/pca-gpn-with-annex-vi.pdf>

Annex VII. Key Elements of PCA Access Restriction and Livelihood Impact Management Instruments: Process Frameworks and Livelihood Restoration Plans

Annex VII is available online at the following URL:

<https://thedocs.worldbank.org/en/doc/427d9e01e5c3e10748a22cdb3ec5e3b7-0290012026/original/pca-gpn-with-annex-vii.pdf>

Annex VIII. Indicative Terms of Reference for Preparation of a Process Framework for Projects Involving PCAs

Annex VIII is available online at the following URL:

<https://thedocs.worldbank.org/en/doc/4577b755d9ca86baef7ee14e269d16ab-0290012026/original/pca-gpn-with-annex-viii.pdf>

Annex IX. Indicative Terms of Reference for Preparation of a Livelihood Restoration Plan (LRP) Involving PCAs

Annex IX is available online at the following URL:

<https://thedocs.worldbank.org/en/doc/9d7453f2b7032b0d38df29270bd2e8c6-0290012026/original/pca-gpn-with-annex-ix.pdf>

Annex X. Checklist Related to Indigenous Peoples and Sub-Saharan Historically Underserved Traditional Local Communities

Annex X is available online at the following URL:

<https://thedocs.worldbank.org/en/doc/0cd427aaa8236d0113c04dcb081fad0a-0290012026/original/pca-gpn-with-annex-x.pdf>

Annex XI. Designing and Implementing Grievance Mechanisms (GMs) in Protected Area Projects

Annex XI is available online at the following URL:

<https://thedocs.worldbank.org/en/doc/3bbdc342420e21c3182d1697b3c424e3-0290012026/original/pca-gpn-with-annex-xi.pdf>

Annex XII. Illustrative Protocol for Borrower Reporting to the Bank on Project-Related Incidents

Annex XII is available online at the following URL:

<https://thedocs.worldbank.org/en/doc/1f47c42fc82800648c6b63dc5d5f1516-0290012026/original/pca-gpn-with-annex-xii.pdf>