

## **Environment & Social Framework for IPF Operations**

### **Good Practice Note**

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

### **Annex V**

The following annex is part of the GPN on Managing the Risks of Projects Involving Protected and Conserved Areas. For ease of use, it will be uploaded as a separate file and will have links provided to it in the full text of the GPN, which will also be available online at the following URL:

<https://thedocs.worldbank.org/en/doc/345f6737b55b565433d838862b5d56f9-0290012026/original/pca-gpn-with-annexes-i-iii.pdf>

# Annex V. Illustrative Assessments and Mitigation Measures

The following annex is part of the **Good Practice Note on Managing the Risks of Projects Involving Protected and Conserved Areas**, which is accessible at the following URL: <https://thedocs.worldbank.org/en/doc/345f6737b55b565433d838862b5d56f9-0290012026/original/pca-gpn-with-annexes-i-iii.pdf>

Which assessments and mitigation measures are required by Bank policy depends on the project. The following are examples of assessments and mitigation measures that may be required if the issue is deemed relevant for the project.

Issue	Illustrative Assessments and Risk Factors	Illustrative Mitigation Measures
<b>Protected and Conserved Area Governance and Legal Framework</b>		
<p><b>1. Protected and Conserved Area (PCA) and Project Boundaries</b></p>	<p>The Bank and Borrower confirm the precise boundaries of the project area as determined by the scope of activities, access restrictions, and Project Development Objective (PDO).</p> <p>The Bank and Borrower confirm the precise geographical boundaries of PCAs, which may have evolved over time. They also determine if there are any pending delimitation disputes with neighboring communities.</p> <p>The Borrower confirms whether any changes in PCA boundaries or designations are expected.</p>	<p>The Bank ensures the financing agreement and Project Appraisal Document (PAD) accurately reflect the project’s geographical scope, activities, and PDO.</p> <p>The Bank ensures that the Borrower assesses the direct, indirect, and cumulative impacts of project activities, including those that extend beyond the project area (e.g., rest of the PCA or outside the PCA).</p> <p>The Bank identifies any associated facilities and their locations, and ensures that both the Borrower and the Bank have the means to monitor relevant activities and risks in those areas as well.</p>
<p><b>2. Relevant Institutions</b></p>	<p>Borrower identifies all relevant community groups, nongovernmental organizations (NGOs), Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (IPs/SSAHUTLCs), government institutions, companies, and any other groups with a role in the project or PCA and extent of existing formal and informal collaboration, e.g., PCA management entities, police or military that conduct joint PCA patrols with PCA management entities, environmental or agricultural agencies, local government agencies charged with land titling or resettlement.</p> <p>The type of institutional assessment will depend on the kinds of activities financed by the Bank. See <b>Annex III</b> for details.</p>	<p>Through the project legal agreement and referenced documents, including the Environment and Social Commitment Plan (ESCP), the Bank ensures that each relevant entity involved in the project is required to cooperate with project implementing entities through participation in the Stakeholder Engagement Plan (SEP), Process Framework (PF), other environmental and social (E&amp;S) plans or other means (e.g., PCA management plan). To ensure that the project is carried out in accordance with Bank policies, the Bank may require the adoption of binding agreements between government entities in charge of the project and any other agencies, relevant government or nongovernment agencies and other groups with a role in protection of the area. This would also entail a review of the legal and operational framework which regulates how these entities engage with each other when they manage the PCA/project area, including during enforcement activities.</p>

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		<p>The Bank and Borrower identify appropriate mitigation measures based on the results of the institutional and residual risks assessments, such as measures in the ESCP to address institutional, regulatory, or operational gaps, improve agency procedures and codes of conduct (CoCs), and possible provisions in the project legal agreement. These might include conditions of disbursement for certain activities or components and additional events of suspension in the financing agreement.</p>
<p><b>3. Relevant Laws, Rules, and Operating Procedures</b></p>	<p>The Borrower confirms when and through which legal instrument PCAs were created or will be created.</p> <p>The Borrower confirms the designation/categorization/status of the land in the PCAs where management will be improved, checks all relevant laws and regulations (e.g., land laws, village registration acts, PCA laws, expropriation laws), considers applicable international agreements to which it is a party and related international court decisions, and documents any inconsistencies or overlaps. Borrower to review any current or past land-related disputes in the project area.</p> <p>The Borrower confirms its intent regarding the creation or modification of the PCA that affects the rights of IPs/SSAHUTLCs and/or local communities, and the Bank ensures that these are consistent with Bank policy. For example, certain project activities with adverse impacts on IPs/SSAHUTLCs—such as adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation—require the Borrower to obtain the affected people’s Free, Prior, and Informed Consent (FPIC). See Environmental and Social Standard 7 (ESS7), paragraph 24.</p> <p>The Bank and Borrower confirm that no arms or weapons are being financed under the project, with the Bank clarifying what is or is not eligible for Bank financing and procurement (e.g., bush knives, machetes, tranquilizer guns).</p> <p>The Bank ensures that the Borrower’s PF, Livelihood Restoration Plan (LRP), SEP, Grievance Mechanism (GM), Security Management Plan and/or any relevant E&amp;S plans and project</p>	<p>The Bank and Borrower should ensure that all relevant government agencies are involved, either formally under the project or through regular communication channels (e.g., housing ministry, land ministry, Indigenous Peoples ministry, natural resources ministry) and ensure that commitments to actions required to comply with Bank policies are clear and enforceable.</p> <p>Bank ensures the government has clarified its intentions with regard to the communities in the PCA, such as regularization in-situ or resettlement, or limited access, or relocation and compensation. If the government intends to resettle communities, a Resettlement Policy Framework (RPF) or Resettlement Plan (RP) consistent with ESS5 needs to be adopted and implemented prior to any displacement. Measures to assess impacts on and engagement of IPs/SSAHUTLCs should be described within the IPPF or IPP and aligned with the SEP, LRP, PF and any other relevant document.</p> <p>The Bank explores possible protections and remedies in the financing agreement in case the government modifies PCA boundaries or land rights in a manner contrary to the objectives of the project or baseline assumptions for the project, particularly with respect to displacement impacts.</p> <p>The Bank discusses with the Borrower legislative or other government acts clarifying areas of legal uncertainty or concern, such as allowed uses of the land and restricted PCA resources.</p> <p>The Bank ensures that the project prohibits financing of arms and weapons. It scrutinizes past procurement records and future</p>

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	<p>manuals/Standard Operating Procedures (SOPs) include procedures for interactions between security forces and affected communities and cover potential issues pertaining to use of force.</p> <p>The Bank ensures that the Borrower’s institutional and legal assessment of the government agency that is empowered to use force under the project adequately covers laws, rules and practices pertaining to use of force, including prevention, that are consistent with good international standards (see <b>Annex III</b> for more details).</p> <p>For engagements with security/military or criminal justice entities, the Bank carries out an appropriate risk assessment in accordance with the requirements of the Policy on Fragility, Conflict, and Violence (FCV Policy) and/or the 2012 Criminal Justice Note.</p> <p>Relying on specialized experts in the enforcement of PCA rules in the region, the Borrower reviews the government agency’s protocols for the use of force for alignment with good international practice—including hiring, staff rotation, training, due process and human rights, and disciplining procedures (see <b>Annex VI</b> for more details).</p>	<p>procurement requests. Bank team leaders and procurement specialists are trained as needed.</p> <p>The Bank hires consultant(s) with expertise in good international practice in enforcement of PCA rules and PFs/LRPs and/or SEPs to review the Borrower–prepared institutional assessment and the other relevant documents (e.g., PCA management plan, SEP, PF, GM, LRP, Security Management Plan).</p> <p>Where appropriate, the Bank and Borrower agree on gap-filling measures based on the findings of the institutional and other risk assessments (such as those carried out in accordance with the FCV Policy and/or 2012 the Criminal Justice Note). The agreed measures—and, as applicable, the PF, LRP, Security Management Plan, project monitoring system, and/or indicators—may need to be added to the ESCP and/or made disbursement or effectiveness conditions under the project legal agreement, and/or added to project components and/or the Project Operational Manual, so that the mitigation measures precede the impact-generating activities.</p> <p>Relying on specialized experts, the Bank agrees with the Borrower on ways to revise or supplement CoCs and SOPs of entities that enforce PCA rules to fill any gaps in accordance with good international practice and standards that build on those in ESS4, including protocols for community relations, engagement escalation, and use of force; workplace safety standards for enforcement personnel; and on-boarding and ongoing training for such personnel. These are applied to all entities and all individuals (even those seconded or temporarily assigned) involved in PCA enforcement activities under the project.</p> <p>The Bank explores inclusion of possible remedies in the project legal agreement in case the organizations with a mandate to enforce PCA rules affecting the project act in a manner that could threaten the viability of the project.</p>
<b>Social and Stakeholder Dimensions</b>		
<b>4. Access Restrictions</b>	The Borrower assesses which communities live in or near the PCAs, to what extent they depend on PCA resources for their livelihoods, and to what extent their livelihoods may be restricted	The Bank ensures that the Borrower conducts an Environmental and Social Impact Assessment (ESIA), or other adequate E&S assessment and adopts and implements a plan consistent with ESS5 to mitigate

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	<p>by the project. The process of identifying project-affected persons should be based on reliable and up-to-date socio-economic data on aspects such as where they are located, in what ways and how regularly they use PCA resources, how dependent they are on those resources for their livelihoods and economic development, their social and political institutions (including longstanding conflicts or alliances among groups), demographics, cultural practices, etc. Particular attention should be given to identifying vulnerable groups and those with differentiated cultures or economies, such as IPs/SSAHUTLCs, forest dwellers, pastoralists, or traditional groups.</p> <p>The Borrower collects baseline data on illegal and legal access to PCA resources (e.g., hunting, collection, grazing, poaching, grazing, fishing, firewood).</p> <p>The Borrower assesses to what extent communities will be adversely affected by project activities’ establishment of new access restrictions or enhanced enforcement of existing ones.</p> <p>The Borrower identifies existing stakeholder consultations and outreach mechanisms related to the enforcement of restrictions including new or better enforced PCA rules.</p> <p>The Borrower assesses whether access restrictions induced by the project may result in indirect or cumulative impacts within or outside the project area (e.g., migrations or displacement of economic activity to or from areas outside the PCA).</p> <p>The Borrower assesses any legacy issues related to impacts on customary rights or traditional/cultural uses and whether they have been or can be resolved.</p>	<p>impacts on land and resource rights and livelihoods, including an LRP, and/or (if the enabling conditions are present) a PF. The Bank also requires the Borrower to prepare an RP or RPF if physical displacement is required by the project.</p> <p>A PF includes a participatory process for determining appropriate restrictions on use and sets out the mitigation measures to address adverse impacts on livelihoods that may result from such restrictions. See <b>Annexes VII and VIII</b> for more details.</p> <p>An LRP describes the participatory plan for addressing adverse impacts from access restrictions, including identification and design of livelihood strategies and options and transitional support measures. See <b>Annexes VII and IX</b> for details.</p> <p>IPs/SSAHUTLCs, if present and adversely affected, may require separate processes to address diverse impacts, and to ensure their FPIC where required under ESS7. See, e.g., ESS7, paragraphs 24, 30.</p> <p>Given that many projects have a large number of affected people facing different circumstances and who are affected in different ways, it may be necessary to set up different processes (PFs, LRPs, etc.) to cover different groups.</p> <p>The Bank reviews GM logs for complaints related to rights, access and livelihood restrictions, and enforcement abuses. It evaluates the level of trust between communities and authorities and whether fear of retaliation is a factor.</p> <p>Collaborative governance and participatory governance models are considered, as are possible strategic plans or other mitigation measures to address significant indirect or cumulative impacts of the project.</p> <p>The Bank also considers further assessments and planning to enable sustainable multi-use approaches and to enhance communication with communities on resource sustainability.</p>
<p><b>5. Physical Resettlement</b></p>	<p>The Borrower identifies populations living in or near PCAs.</p> <p>The Borrower identifies past, existing, or planned government efforts to adjust boundaries or change rules governing PCAs as</p>	<p>The Bank ensures that the Borrower has clarified its intentions with regard to any possible physical resettlement of communities in the PCA. It screens for potential risks and impacts of physical relocation with the aim to avoid or minimize such impacts where possible. If the</p>

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	<p>well as past, existing or planned government efforts to resettle communities living in or near PCAs.</p> <p>The Borrower identifies processes and developments that might lead to resettlement (e.g., natural hazards, human-wildlife conflict, access restrictions, land tenure changes, private concessions, and development). It considers whether these might be induced by the project or affect the project’s ability to achieve its objectives.</p> <p>The Borrower identifies which government agencies are responsible for the establishment of PCAs and their rules, and for implementing expropriation and involuntary resettlement, as well as any other relevant agencies (e.g., environment, forestry, fisheries, tourism).</p>	<p>Borrower intends to resettle communities in the context of the project, the Bank ensures that the consideration of alternatives to displacement and the overall social viability of the project and PCA management plan are well-documented. Adoption of an RP or RPF consistent with ESS5 is required. Where an RPF is in place, its provisions need to be applied to resettlement planning and consultation processes initiated by the government and the respective RPs developed and implemented in accordance with it prior to any displacement.</p> <p>The project establishes clear operating rules/memoranda of understanding between the Bank and each relevant government agency under the project.</p> <p>The Bank considers which government agencies need to be formally included under the project and subject to obligations under the project legal agreement to ensure fulfillment of resettlement-related obligations.</p> <p>The Bank supervises the government’s resettlement activities, if any. It may consider setting up independent and/or participatory monitoring of communities potentially subject to involuntary resettlement.</p>
<p><b>6. Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities</b></p>	<p>The Borrower assesses whether IPs/SSAHUTLCs live in or near the PCA, access the PCA for their livelihoods or rituals (sometimes on a seasonal or temporary basis), have been adversely affected by the creation of a PCA before the project, or may move in or near the area during project implementation.</p> <p>This assessment should consider the unique risks, cultural and identity factors, rights, consultation processes/FPIC, results/opportunities/equitable benefits, and co-management roles and responsibilities involving IPs/SSAHUTLCs. This assessment should consider all relevant provisions of Bank policy, national and other law, and international agreements to which the Borrower is a party that are directly applicable to the project. This includes ESS7’s provisions for the rights of IPs/SSAHUTLCs over their customary lands and natural resources. These include culturally appropriate consultation and FPIC, the legalization of</p>	<p>The Borrower prepares an Indigenous Peoples Plan (IPP) and reflects the needs of IPs/SSAHUTLCs in the SEP, LRP/PF and RP/RPF.</p> <p>The Bank ensures that the Borrower adopts and implements an Indigenous Peoples Planning Framework (IPPF) and IPP(s) consistent with ESS7 and follows FPIC requirements where applicable.</p>

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	<p>their customary rights, continued access to lands and natural resources, equitable access to project benefits and benefit sharing when commercial use may be at play, for example, for tourism. See, e.g., ESS7, paragraphs 29–33; ESS1, paragraph 26. The Bank and The Borrower should also consider situations where IPs/SSAHUTLCs have lost collective attachment to PCAs in the project area that were distinct habitats or ancestral territories, because of forced severance, conflict, government resettlement programs, dispossession of their land, natural disasters, or incorporation of such territories into an urban area (see ESS7, paragraph 9).</p> <p>Recognition of customary tenure and usage rights of IPs/SSAHUTLCs vary greatly by country. In some countries, IPs/SSAHUTLCs hold formal recognition of collective rights to live within the PCA and access and manage the respective lands and natural resources. In some countries, IPs/SSAHUTLCs also are officially recognized as environmental authorities . In other countries, their rights are non-existent or tenuous and IPs/SSAHUTLCs live within their ancestral spaces under customary rights regimes, recognized by international law, but often with no or fragile recognition in national frameworks or they occupy areas to which they have been involuntarily displaced. See <b>Annex X</b> for more details.</p>	
<p><b>7. Vulnerable Groups</b></p>	<p>The Borrower assesses whether vulnerable groups live in or near the PCA, access the PCA for their livelihoods or rituals (may be seasonal), have been adversely affected by the creation of a PCA before the project, or may move in or near the area during project implementation.</p>	<p>The Borrower reflects the needs of vulnerable groups in SEP, LRP/PF, RP/RPF, ensuring that adequate provisions for their participation is made (e.g., language, physical access), impacts are identified, and required and/or agreed mitigation measures are implemented.</p>
<p><b>8. Human-wildlife Conflict</b></p>	<p>The Borrower assesses whether human-wildlife conflict could be exacerbated or otherwise affected (e.g., change in conflict species, change in geographic area or seasonality/timing of conflict) by the establishment or management of a PCA, or has been affected by the creation of a PCA before the project.</p>	<p>The Borrower integrates human-wildlife conflict issue into stakeholder consultation and PCA management mechanisms (SEP, PF, LRP, PCA management plan, etc.), including periodic meetings of all stakeholders that help alert the Borrower and Bank to any evolution in tensions during the implementation of the project (e.g., increase in human-wildlife conflict, retaliatory wildlife killing, shift in community acceptance of impacts).</p>

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		<p>Additional project interventions that could avoid or mitigate human-wildlife conflict incidents (e.g., early warning systems, deterrents such as fences or noise/light alarms, government incident reporting hotlines, rapid response teams, behavior change) or help build community tolerance of impacts and promote human-wildlife coexistence (e.g., livelihoods diversification, compensation schemes for impacts arising from species translocated into PCAs, education and awareness) should be considered.</p> <p>The Bank reviews GM logs for complaints related to the impacts of human-wildlife conflict on local communities and may consider supporting the establishment or strengthening of government notification and incident reporting schemes.</p> <p>Project support for programs to manage wildlife incursions, compensate villagers for damage and improve benefit sharing from tourism should also be considered.</p>
<p><b>9. Stakeholder Engagement</b></p>	<p>The Borrower identifies all relevant stakeholders, including potential project beneficiaries and communities adversely affected by improved PCA management. This includes seasonal or temporary users of the land whose access is being restricted under the project. This wide range of relevant stakeholders and their accessibility needs and constraints (e.g., languages, culture, literacy, physical dispersion, remoteness) should be reflected in the SEP and the LRP/PF (and/or RP/RPF if applicable).</p> <p>Consultations and other forms of stakeholder engagement (e.g., information on project impacts, feedback, opportunity to present claims, participatory planning and decision-making as appropriate) should also be consistent with ESS7 where IPs/SSAHUTLCs are involved, including an FPIC process where applicable under ESS7.</p> <p>The Borrower identifies existing processes for PCA management authorities to interact with communities in or near PCAs.</p>	<p>The Bank and Borrower consider creating or enhancing the role of “outreach officers,” that is, government employees who are not PCA rules enforcement personnel but seek to improve relations between such personnel and local communities. They also consider creating or enhancing existing community resource management entities and/or training community representatives as facilitators between the PCA authorities and communities.</p> <p>The Bank ensures that the Borrower adopts and implements a robust SEP that includes regular consultation with all relevant stakeholders, not just project beneficiaries and government agencies. The SEP should be coordinated with the PF and/or LRP/RP/RPF and other relevant project plans and documents, including the PCA management plan. In the case of IPs/SSAHUTLCs, the IPPF and IPP should outline the measures for meaningful consultation and/or FPIC as relevant.</p> <p>The Bank draws on lessons learned globally from Bank-funded and other projects on stakeholder engagement. Such lessons include openness and inclusiveness with measures to ensure accessibility, avoid discrimination; commitment and good faith from the government and private developers; early identification/rigorous</p>

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		<p>mapping of key stakeholders; continued improvement of stakeholder engagement, feedback and accountability, and GM procedures; multiple avenues for and timely management of complaints; dedicated staff and budget for stakeholder engagement; clear roles and responsibilities (e.g., developer, contractors); trust-building; working with recognized, trusted national/local systems and facilitators; and proactive communication/countering misinformation.</p>
<b>Project Management, Grievance Mechanisms, and Incident Reporting</b>		
<p><b>10. Bank Supervision and Adaptive Management</b></p>	<p>The Bank requires the Borrower to implement robust implementation monitoring and reporting. The Bank assesses the evolving needs and risks across the project area (e.g., livelihood disruption, including any unplanned physical displacement, food insecurity and loss of income, increased human-wildlife conflict, illegal grazing, violent confrontations) on a regular basis to set in place commensurate supervision plan(s).</p> <p>The Bank identifies relevant agencies that can report to the Bank on relevant developments, and ensures they have the appropriate personnel or consultants. Third-party and community monitoring may be used where needed, complemented by media monitoring. The project management budget should include the necessary resources. The Bank allocates appropriate resources for its own site visits and supervision activities as needed.</p>	<p>The Bank ensures that the Borrower commits to and implements a robust monitoring and reporting framework, including adaptive management provisions. As appropriate, the Borrower and the Bank agree on independent monitoring, including community monitoring and/or other feedback mechanisms, and consider independent and remote monitoring as needed.</p> <p>The Bank conducts regular supervision of the agreed measures and project activities and areas (even if vast) focused on enhanced PCA management.</p> <p>Bank supervision includes prompt field visits to project areas that are the subject of conflict or serious complaints reported through project reporting mechanisms or by any project or external stakeholders, including validated media reports.</p> <p>As needed, the Bank hires consultant(s) with expertise in good international practice in PCA rules enforcement and restrictions of access/PFs/LRPs, IPs/SSAHUTLCs (where applicable), land and resource management, and related conflict management to guide the Bank in project design and supervision.</p> <p>The Bank tailors/adjusts the project supervision plan based on new events, risks, or reported incidents that it learns about from any source. Budgets may need to be adjusted accordingly.</p> <p>The Bank considers third-party, community, remote and media monitoring, particularly if large areas are involved.</p>

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<p><b>11. Grievance Mechanisms and Incident Reporting</b></p>	<p>The Borrower identifies and assesses existing government, village, or other structures for raising complaints in the project area. It also assesses anti-retaliation and whistleblower protection protocols.</p> <p>The Borrower surveys history and resolution of disputes/complaints in the project area (e.g., media search, key informant interviews).</p> <p>Borrower to identify risks of retaliation for project-related complaints—including against community members, IPs/SSAHUTLCs, and civil society advocates.</p> <p>The Borrower ensures that the GM is accessible (e.g., languages, channels—including oral, remote—locations, facilitators) and has scope to address all claim types under the project, including security-related ones, as well as alternative/confidential channels for sensitive claims, for example, Gender-based Violence (GBV)/Sexual Exploitation and Abuse (SEA), intimidation and retaliation, and complaints against those in charge of the project and/or the GM).</p>	<p>The Bank and Borrower agree on an incident reporting protocol to be included in the Project Operational Manual. See <b>Annex XII</b> for more details.</p> <p>The Bank ensure that the project, through the government or other relevant organizations, establishes a GM accessible in all the areas where (i) personnel involved in management and enforcement activities are operating; (ii) restrictions of access to the PCA are affecting community livelihoods; and (iii) the project is having any adverse impacts on the community. Outreach to communities potentially affected by the project should be in a language they can understand, in a format which is accessible to them and provides avenues of complaint management that are appropriate to their circumstances/means. The GM should leverage customary and traditional processes and authorities for preventing, managing, and resolving conflict.</p> <p>The GM should include non-retaliation measures, including the ability to make claims confidentially or contact the Bank directly through a hotline.</p> <p>GM design and implementation can be informed by global Bank practice and lessons on GMs. See <b>Annex XI</b> for more details on GMs.</p> <p>The Bank should consider other project interventions that could avoid or mitigate incidents (e.g., communication campaigns, appointment of community-liaison officers, and enhanced monitoring and reporting measures, including community monitoring and third-party oversight, thorough vetting of personnel involved in PCA rules enforcement—and exclusion of personnel with a history of past abuses—increased training and equipment of PCA and enforcement personnel on project mechanisms that help prevent and resolve conflicts, performance monitoring of personnel involved in PCA rules enforcement that includes tracking of violent incidents, and amendments to the CoC applicable to enforcement personnel).</p>