

Safeguards Compliance Memorandum

Project Information

Project Name	Securing a Living Amazon through Landscape Connectivity in Southern Guyana
GEF Focal Area	Biodiversity and ASL Integrated Program
Safeguards Categorization	Medium Risk

Project Description

To support the ecological integrity of the Amazon, the Global Environment Facility (GEF) approved the Amazon Sustainable Landscapes Program (ASL) II, led by the World Bank as the GEF Agency, in 2019. The program objective is to improve integrated landscape management and conservation of ecosystems in targeted areas in the Amazon region, and includes Child Projects in Bolivia, Brazil, Colombia, Ecuador, Guyana, Peru and Suriname. The proposed Child Project, Securing a Living Amazon by Strengthening the Management of Protected Areas and Priority Landscapes in Southern Guyana, contributes directly to this program. The aim of the Project is to strengthen landscape connectivity through improved management of the Kanuku Mountain Protected Area and in the North Rupununi Wetlands in southern Guyana. This will be achieved through the following four components:

1. **Integrated Protected Landscapes:** It will support strengthening of the KMPA's management, in coordination with the Indigenous communities who live around and utilize resources of the protected area. More specifically, the project will support new infrastructure for PAC's site level operations and provide training and capacity building for PAC site level staff and local communities, and strengthen natural resource use planning in the KMPA through a participatory process and following the FPIC process.
2. **Integrated Productive Landscapes:** The project will support a process for integrated management planning in the North Rupununi Wetland landscape, which will include a governance framework for decision making, as well as overall goals and objectives for the landscape. The project will also support implementation of sustainable land and water management activities.
3. **Policies/Incentives for Protected and Productive Landscapes:** The project will support the revision of the PA Act through a legal review, preparation of regulatory text in consultation with all key stakeholders, and submission of Revised Act to Cabinet for Review and tabling in Parliament.
4. **Capacity Building and Regional Cooperation:** The component includes monitoring and evaluation, communications, as well as cooperation with the wider Amazon Sustainable Landscapes Impact Program.

Project Location and Salient Physical Characteristics Relevant for the Safeguards Analysis

The Child Project area lies in southern Guyana and comprises two sites: the North Rupununi Wetlands (NRW) and the adjacent Kanuku Mountains Protected Area (KMPA). The North Rupununi Wetlands has enormous vertebrate diversity, and consists of a mixture of seasonal/intermittent flooded savannahs and freshwater bodies and permanent freshwater areas, including rivers, streams, creeks, marshes and lakes. Flooding during the rainy season creates a complex hydrological connection between the Amazon and Essequibo River systems and allows for the exchange of fauna and ensures the water and food security for twenty-one indigenous Makushi communities, which have approximately 7,000 inhabitants. This flooding and hydrological connection replenish fish stocks, recharges water sources, allows for the exchange of fauna, particularly freshwater fishes thereby increasing diversity, and promote gene flow. The Kanuku Mountains, which are adjacent to the NRW, were declared a protected area in 2012. It is documented as having the second-highest bat diversity (89 species) of any protected area in the world and holds 70% of the 25 bird species considered to be endemic to the Guiana Shield. 99% of its 611,000 hectares are covered in forest, making it important for carbon sequestration (10.4% of Guyana's irrecoverable carbon by mass is in PAs)¹ and climate regulation; 1% is savannah.

Safeguards Standard	Triggered	Explanation
Natural Habitats	Yes	This policy is triggered as the proposed Project directly targets protecting and restoring natural habitats; including through improved PA management plans, improved logging practices, and strengthening local communities' ability to conserve the natural resources they depend on. Additionally, the construction activity proposed in Component 1 related to the KMPA management could have an impact on biodiversity if adequate mitigation measures are not in place. Prior to construction of any new building, an Environmental Impact Assessment must be conducted in accordance with WWF safeguards and Guyanese law, and has been included in the project budget.
Indigenous People	Yes	The project will take place on lands customarily and legally owned and used by a number of indigenous communities, and therefore this Policy has been triggered. The Indigenous Peoples within the project area include the Makushi Indigenous peoples, who live in 21 communities, consisting of approximately 7000 persons in the North Rupununi (also North Rupununi Wetlands) and the Wapishana indigenous peoples in the South Rupununi. There is also a small population of Indigenous Wai-Wai peoples, which live in Kanashen Village, which is to the south

		<p>of the project sites. Associated with the Kanuku Mountains PA project site are 11 Amerindian villages and 7 satellite communities located around the Kanuku Mountains Protected Area (KMPA). The population of these 11 communities and 7 satellites is not known.</p> <p>This policy is triggered to ensure the Project respects Indigenous Peoples' rights in the project areas, including their rights to FPIC processes and to tenure over traditional territories; that culturally appropriate and equitable benefits (including from traditional ecological knowledge) are negotiated and agreed upon with the indigenous peoples' communities in question; and that potential adverse impacts are avoided or adequately addressed through participatory and consultative approach. Indigenous peoples live in and/or have cultural, spiritual and economic ties all areas where Project activities will happen, and in most cases are the majority populations in those areas.</p> <p>As the project activities will only be confirmed during the first six months of implementation, and true FPIC processes were not established with communities during the ProDoc stage due to the ongoing COVID pandemic restrictions, an Indigenous Peoples Planning Framework will be prepared as part of the ESMF to conform to WWF's Environment and Social Safeguards Framework. The Indigenous Peoples Plan will be co-created with communities during the first six months of project implementation with the guidance of the Gender and Safeguards Specialist, who will be hired as part of the PMU.</p>
Restriction of Access and Resettlement	Yes	<p>While the proposed Project is unlikely to cause displacement of people, the project might lead to certain access restrictions. Given that the activities proposed under the project include, but are not limited to, protected area management, improved wetlands management and changes in timber use on community lands, WWF's policy on Involuntary Resettlement is triggered because the Project will</p>

		<p>help define and thereby potentially restrict access to natural resources and livelihoods activities.</p> <p>WWF policies prohibit forced evictions, which include acts involving the coerced or involuntary displacement of individuals, groups, or communities from homes and/or lands and common property resources that were occupied or depended upon, thus eliminating or limiting the ability of an individual, group or community to reside or work in a particular dwelling, residence, or location without the provision of and access to, appropriate forms of legal and other protection. In addition, the project will exclude financing any activities that would lead to physical displacement and voluntary or involuntary relocation.</p> <p>However, economic displacement or restriction to livelihoods or access to natural resources may occur (e.g. as a result of negotiating through FPIC-based consultations the establishment of collaborative management arrangements for wetlands and the updated management plan for the Kanuku Mountains Protected Area). This, however, will only occur with the consent of the affected people and following a decision made with all required information at hand. As the specific project activities will only be confirmed with communities within the first year of project implementation, a Process Framework will be prepared as part of the ESMF to conform to WWF's Environment and Social Safeguards Framework.</p>
Community Health, Safety and Security	Yes	<p>This Standard is triggered due to construction activities in Component 1. Additionally, it is triggered because of necessary safety protocols related to the ongoing COVID 19 pandemic.</p> <p>To compliment this Standard, a Guidance Note on Labor and Working conditions will also be issued, due to the construction activities proposed in Component 1 of the project.</p>
Pest Management	No	This Standard has not been triggered, as the project is not going to finance any related activities.
Cultural Resources	TBC	Depending on the final Project activities decided upon in collaboration with communities and other

		stakeholders in Year 1, this Standard may be triggered and a plan created to mitigate identified risks in partnership with potentially affected stakeholders. If no risks are identified with communities, then this Standard will not be triggered and no Plan created.
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Summary of Key Safeguards Issues

Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

The aim of the Project is to strengthen landscape connectivity through improved management of the Kanuku Mountain Protected Area and in the North Rupununi Wetlands in southern Guyana, which will be both environmentally and socially positive. There are no potential large scale, significant or irreversible impacts.

The largest safeguard consideration in this project is seeking the consent of the Indigenous communities in the two project areas to participate in the planned project activities, as there are still project specifics to be determined with the participation of local stakeholders. Details on how this will be accomplished are outlined in the next section.

Describe measures taken by the Project Team to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described:

The project budget includes the following:

- Costs for a full-time Safeguards and Gender Officer to work as part of the PMU for the duration of the project period; and
- Budget for travel costs, workshops and meetings for safeguards monitoring

The inclusion of a Safeguards and Gender Officer on the PUM for the project is a vital measure the project team has taken to ensure they have the capacity to address safeguards policy issues. Their role will be to ensure that yearly ESS Screenings take place to ensure compliance with the project ESMF, that FPIC processes are adequately incorporated and documented in the design and selection of the connectivity corridors; identify entry points and mainstreams gender and safeguards where needed; ensure equitable benefit distribution; and ensure Safeguard recommendations are fully complied with, including in design and implementation of the Grievance Redress Mechanism, capacity-building modules, connectivity corridor governance platforms and monitoring and evaluation tools.

As mentioned above, the largest safeguard challenge of the project is seeking the consent of Indigenous communities in the project areas for their participation in the project. The project has outlined specific actions it will take to ensure this is a community-driven process. To carry out this process, a participatory methodology will be developed that includes the following phases:

- Organizing the Free, Prior and Informed Consent process according to the statutes, governance and decision-making processes of each indigenous organization.
- Socialize the objectives of the consultation, taking into account inclusive and culturally appropriate language and methods
- Development of FPIC processes
- Systematization of the process and the results obtained
- Development of a plan to enhance benefits and mitigate social risks that includes gender recommendations

Additionally, the project clear requirements for FPIC documentation and stakeholder consultations (which will be reported disaggregated per gender).

Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people:

Indigenous and local communities have organized themselves into groups/bodies that are mechanisms for decision making in the landscape. These include:

- Kanuku Mountains Community Representative Group (KMCRG) - Communities around the south and western boundary of the KMPA have organized themselves into this umbrella body which supports decision-making, planning and management of the PA, with the PAC. The office is located in Lethem.
- North Rupununi District Development Board (NRDDB) - Each elected Toshao (Village leader) represents their village's interest on the NRDDB. The NRDDB provides a mechanism for community leaders to meet, discuss, and make decisions relating to the NRDDB operation, management of lands and resources, community planning and development, youth empowerment etc. The management of the NRW has been an important area of focus for the NRDDB. The Bina Hill Institute, which provides education and training, is also part of the NRDDB. The office is located at Bina Hill, Annai, North Rupununi.
- South Rupununi District Council (SRDC) –SRDC was established by order under Section 35 of the Amerindian Act and is the legal representative institution and governing body of the 21 mostly Wapichan communities of the South Rupununi. Some communities that are part of the KMCRG are also part of the SRDC. The office is located in Aishalton, South Rupununi.

Private Sector: There are mining and forestry concession holders, agriculture and ranching leases as well as private sector actors including transportation, tourism and business-related actors in the NRW. These stakeholders will be engaged through the multi-stakeholder platform and as stakeholders to the project, given that their activities impact management and ecological integrity of the overall NRW as outlined in Components 2 and 3. There are also many tourism NGOs and private companies who also work in the NRW who may be informed of project activities.

Government: The project will be executed by EPA, PAC, and the GFC. PAC will oversee activities related to the Kanuku Mountains Protected Area and will engage communities surrounding the PA. The North Rupununi Wetlands are a mosaic of Indigenous titled lands, state lands, forestry concessions, private ranches and agricultural leases, as such, many subject specific government agencies have been

working in the subdistrict and include the EPA, GGMC, GFC, GLSC, MoA, GWCMC, Ministry of Agriculture and the Department of Fisheries, Ministry of Amerindian Affairs and the Regional Democratic Council of Region 9 which has the responsibility for the overall management and administration of the Region. Many of these agencies have also been supportive of development related work in their subject area with the NRDDDB; may of the agencies also conduct outreach and advocacy to communities in the region. These government agencies will be engaged through a multi-stakeholder platform to ensure participatory decision making in the NRW.

Non-governmental Organizations: There are a number of Non-Governmental Organization that are active in the project area. These include Frankfurt Zoological Society, Conservation International – Guyana, IFAD, CIFOR, Field Museum, WWF Guianas, Cobra Collective, Amazon Conservation Trust, Amerindian Research Unit (University of Guyana), and Iwokrama.. All of these organizations actively work with communities in the North Rupununi Wetlands and overall project area, and/or undertake research and assessments of the area. As such, they will be an important stakeholder in the project and should be invited to participate in the multi-stakeholder platform to inform planning of the NRW.

Monitoring and Compliance

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies? **Yes [X]** No [] NA []

Have costs related to safeguard policy measures been included in the project cost? **Yes [X]** No [] NA []

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies? **Yes [X]** No [] NA []

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents? **Yes [X]** No [] NA []

Have relevant safeguard policies documents been sent to WWF-US? **Yes [X]** No [] NA []

Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs? **Yes [X]** No [] NA []

Disclosure Requirements

Required safeguards mitigation plans:

An Environmental and Social Management Framework, which includes an Indigenous Peoples Planning Framework, a Process Framework, and guidance on the creation of a project-level Grievance Redress Mechanism as well as labor and working conditions, including information on preventing child labor.

<p>A Stakeholder Engagement Plan</p> <p>An Environmental Impact Assessment will be required prior to beginning Component 1, Output 1.1.1. This will be completed by qualified environmental engineers either on the PMU or within the firm hired to complete construction of the facilities.</p> <p>A Gender Assessment and Gender Action Plan</p>	
Date received by WWF-US	March 22, 2023
Date Disclosed on WWF-US website	March 23, 2023
<i>In Country Disclosure</i>	
Date Disclosed on EPA website	<p>June 23, 2023:</p> <p>https://epaguyana.org/download/esmf-executive-summary-guyana-asl/</p>
Date Disclosed in project sites	<p>One printed copy of the SEP and the Executive Summary of the ESMF shared with each stakeholder Village as listed below (received Jun 23, 2023- latest):</p> <p>Annai, Apoteri, Aranaputa, Crashwater, Kwaimatta, Kwatamang, Massara, Rewa, Rupertee, Simonie, Surama, Toka, Wowetta, Yakarinta, Yupukari, Fly Hill, ,Hiowa, Kaicumbay, Katoka, Kumu, Meriwau, Moco Moco, Mururanau, Nappi, Parikwarwaunau, Parishara, Quarrie, Quatata, Quiko, Rupunau, Sand Creek, Shea, Shulinab, St. Ignatius</p> <p>One memory stick with electronic copy of all documents, and one printed copy of the SEP, the Full document and Executive Summary of the ESMF lodged at the organisations' offices below:</p> <ol style="list-style-type: none"> 1. KMCRG Office 2. SRDC Office 3. Region 9, Regional Democratic Office <p>Broadcasting on three local Radio stations affiliated with the National Communication Network (NCN):</p> <ul style="list-style-type: none"> • Radio Paiwomak (North Rupununi)-June 29, Tuesday July ,11 & 18, 2023 • Radio Lethem -July 5,12 & 19, 2023

	<ul style="list-style-type: none">Radio Aishalton (South Rupununi) July 7,14 & 21, 2023 <i>N.B. dates may be slightly adjusted based on the local broadcasting issues.</i>
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Approvals

Adrienne McKeehan, Lead Safeguards Specialist	<div>DocuSigned by: <i>Adrienne McKeehan</i> CF36CBFE14D14A7...</div>	Date: 8/8/2023
Brent Nordstrom, Safeguards Compliance Officer	<div>DocuSigned by: <i>Brent Nordstrom</i> DD6030B6C7E2446...</div>	Date: 8/8/2023