





Caatinga Protected Areas Program – ARCA (GEF/GCF ID)

STAKEHOLDER ENGAGEMENT PLAN

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GEF/GCF Agency: WWF US
Lead Executing Agency: FUNBIO

1. Introduction

The Caatinga Protected Areas Program (ARCA) will bolster conservation efforts in the globally significant biodiversity hotspot of the Caatinga biome. The Caatinga is a semi-arid biome occupying over 10% of Brazilian territory, with approximately 27 million residents, 327 endemic species of fauna and 323 endemic species of flora. Respectively, 125 and 253 of these species are endangered, and 46% of the biome's total area has been deforested due to firewood consumption and the conversion of land for agricultural usage. Caatinga Protected Areas (PAs) are underrepresented in the National System of Protected Areas (SNUC) and receive insufficient resources for management, contributing to the non-enforcement of environmental regulations and threats to biodiversity. These issues are aggravated by the socioeconomic vulnerability of the majority of the biome's inhabitants, whose population trends sustain increased natural resource consumption and engagement in illegal activities that threaten biodiversity.

Therefore, the program's four components seek to extend the National System of Protected Areas, strengthen management of these areas, and foster the involvement of Indigenous People and Traditional People and Local Communities (IP/TP&LC) in PA management. This approach intends to leverage improved biodiversity conservation to support local livelihoods, therefore protecting the Caatinga's biodiversity and reducing Greenhouse Gas emissions.

The Caatinga Protected Areas Program (ARCA) Project is structured in four components, as follows:

Component 1 – Creation and Improved Management Effectiveness of Protected Areas

Outcome 1.1. Creation of New Protected Areas:

This Outcome will support the design and proposal of new PAs and expansion of existing ones through biodiversity surveys (especially in understudied areas of Caatinga), assessment studies, public consultation, and field activities. New areas will be defined based on the recently updated Priority Areas for Conservation Map and additional criteria such as: areas regarded of extreme importance for the protection of endangered species, biodiversity relevance and representativeness, endemicity and threatened species, according to the availability of data. Additionally, the biodiversity surveys will contribute to identification of potential connectivity corridors, which will be supported under a complementary GEF-8 proposal that is in development.

Outcome 1.2. Improved Management Effectiveness of Existing Protected Areas:

This Outcome will support the improved management of existing PAs by providing the necessary management infrastructure and equipment, supporting the participative development and implementation of management plans and protection and surveillance activities, among others. Special focus will be given to climate adaptation actions such as the development of fire management plans and capacity building to PA staff and local communities to deal with desertification and climate change. Under this outcome, the Project will build the technical, institutional and governance capacity of the PA Management Councils, which are constituted by government, civil society and IP/TP&LC. Selection of

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¹ https://ispn.org.br/biomas/caatinga/fauna-e-flora-da-caatinga/

existing PAs to be supported by this Project will likely be based, among others, on the following criteria: (i) the existence of threatened species in the area; (ii) the need for investments for equipping the protected area; (iii) interest and human and financial capacity to implement Project activities; and (iv) the likelihood of establishing working partnerships with local communities.

A preliminary exercise accounted for a minimum of 4,581,821 hectares of PAs in the Caatinga biome that will benefit from this Project.

Component 2 - Endangered Species Conservation:

Outcome 2.1. Improved Implementation of Endangered Species National Action Plans for endangered species conservation

This Outcome will promote more effective management of threatened species in the Caatinga through (i) implementation of threatened species guidelines planned in PANs, and (ii) monitoring of implemented PANs.

Outcome 2.2. Combating Illegal Wildlife Poaching and Trafficking

This Outcome aims to curb illegal trade and poaching through media campaigns and outreach to reduce demand for products and reduce engagement in poaching/trafficking and increasing government capacities for combating illegal poaching and trafficking.

Component 3 - Capacity Building of PA Staff and IP/TP&LC

Outcome 3.1 Strengthened IP/TP&LC and PA staff capacities for improved PA governance, management and natural resource use

This Outcome will support IP/TP&LC groups living inside and in the surroundings of PAs in the Caatinga Biome, enhancing their capacity to participate in PA governance and reducing pressure on natural resources. To this end, under Output 3.1.1, capacity building and training will be provided to government and IP/TP&LC groups. Under Output 3.1.2, calls for proposals will be launched, with associated technical assistance to IP/TP&LC groups to develop and submit proposals. Selected proponents will receive sub-grants to fund IP/TP&LC group action on livelihoods that are based on sustainable natural resource use in/around the target PAs and other technical assistance and operational support to IP/TP&LC groups for participation in PA governance, PA management and natural resource use within PAs.

Component 4. Communication and Knowledge Management

Outcome 4.1 Project Communication and Knowledge Management

This Outcome will enhance the coordination, management, and communication necessary for Project execution by, among other actions: (i) instituting effective day-to-day oversight and supervision of the Project, providing support to Project coordination teams in fulfilling their duties and obligations (including

facilitating Project audits), and devising and executing a comprehensive communication strategy for the Project.

Monitoring and Evaluation (M&E)

A structured approach to monitoring and evaluation guarantees that the project's progress and impact are meticulously tracked, with findings from mid-term and terminal evaluations informing adaptive management strategies.

Project Sites

Project sites span across several distinct areas within the Caatinga, selected based on their ecological significance and the urgency of intervention required for their preservation and restoration. Their baseline management effectiveness was assessed using the Analysis and Management Monitoring System (SAMGe), further informing the selection process. The relevant PAs include (states included in parentheses):

- PA Lago do Sobradinho (BA)
- PA Dunas e Veredas do Baixo Médio São Francisco (BA)
- PN Serra das Confusões (PI)
- PN do Boqueirão da Onça (BA)
- PN da Serra do Teixeira (PB)
- PA do Boqueirão da Onça (BA)
- PE Mata da Pimenteira (PE)
- EE Serra da Canoa (PE)
- PA Lagoa de Itaparica (BA)

On the following pages, Figure 1.0 outlines the extent of the Caatinga biome, mapping PAs respectively managed by state and federal government entities, as well as IP/TP&LC communities; Figure 1.1 displays ARCA PAs in conjunction with settlements.

Figure 1.0 – PAs within the Caatinga Biome

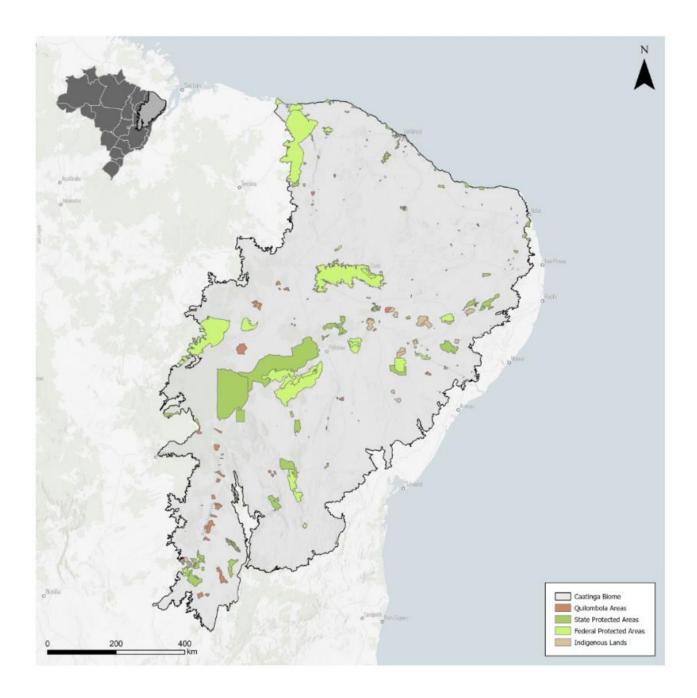
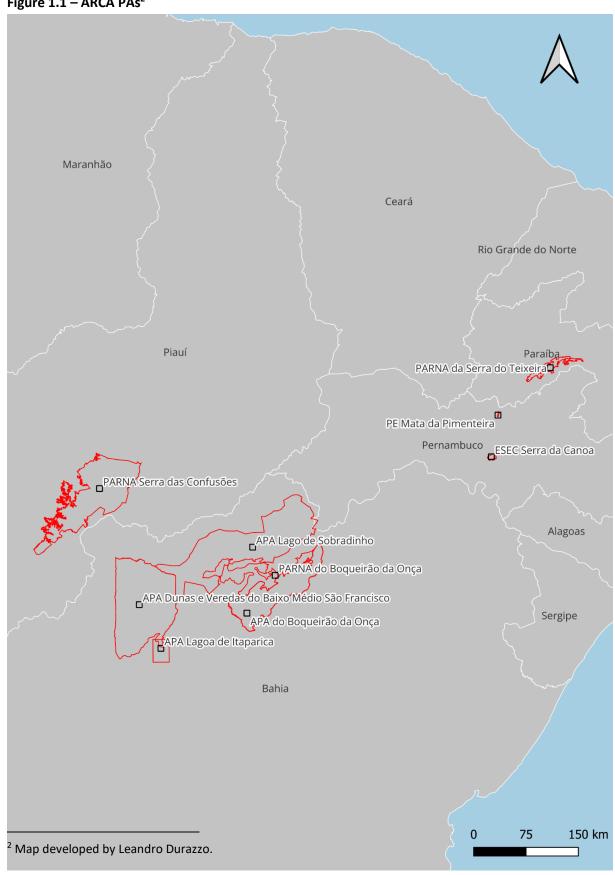


Figure 1.1 – ARCA PAs²



2. Regulations and Requirements

Summary of Federative Republic of Brazil Policies and Regulations on Stakeholder Engagement

The Constitution of the Federative Republic of Brazil included the Fundamental Rights and Guarantees of all persons with the right to receive, from the public agencies, information of private interest to such persons, or of collective or general interest, which shall be provided within the period established by law, subject to liability, except for the information whose secrecy is essential to the security of society and of the State.³ One of the ten principles in the National Environmental Policy⁴ is to ensure environmental education of the community to enable them to actively participate in defending the environment. The Law on Environmental Education⁵ further defined the principles for engagement to ensure a holistic, democratic and participatory approach which links the natural, socio-economic and cultural environments. More specifically, the Law to establish the National System of Nature Conservation Units⁶ requires that conservation management is carried out in a participatory manner, including in development of management plans. It explicitly requires that Conversation Units seek support and cooperation from non-governmental organizations, private organizations and individuals for the development of studies, scientific research, environmental education practices, leisure and ecological tourism activities, monitoring, maintenance and other management activities. The National Strategic Plan for PAs⁷ further seeks to expand stakeholder engagement in management of PAs in outlining one of the core principles to promote participation and social inclusion in and around PAs.

WWF Standard on Stakeholder Engagement

The WWF GEF Agency requires all GEF projects comply with GEF and WWF standards on Stakeholder Engagement, specifically the WWF <u>Standard on Stakeholder Engagement</u> and the associated <u>Procedures for Implementation of the Standard on Stakeholder Engagement</u>. Stakeholder engagement is an overarching term that encompasses a range of activities and interactions with stakeholders throughout the project cycle and is an essential aspect of good project management.

The WWF Standard on Stakeholder Engagement requires that the Project Management Unit (PMU), housed within the Executing Entity FUNBIO, ensures engagement of key stakeholders throughout the life of the project; communicate significant changes to project stakeholders and consult on potential risks and impacts; establish a Grievance Redress Mechanism (GRM) and register and respond to grievances throughout project execution, and; disseminate information in a way that is relevant, transparent, objective, meaningful, and easily accessible. The Standard on Stakeholder Engagement promotes an inclusive process to support the development of strong, constructive and responsive relationships that

³ Constitution of the Federative Republic of Brazil Constitutional text of October 5, 1988, with the alterations introduced by Constitutional Amendments No. 1/1992 through 64/2010 and by Revision Constitutional Amendments No. 1/1994 through 6/1994. TITLE II Fundamental Rights and Guarantees CHAPTER I Individual and Collective Right, Article 5, section XXXIII. Official English translation.

⁴ National Environmental Policy, Act No. 6.938, August 31, 1981.

⁵ Law on Environmental Education, Act No. 9,795, April 27, 1999.

⁶ Law to establish the National System of Nature Conservation Units, Act No 9.985, July 18, 2000.

⁷ <u>Decree to establish the National Strategic Plan for Protected Areas</u>, Act No 5.758, April 13, 2006.

help to identify and manage risks, and which encourage positive outcomes for stakeholders and project activities.

3. Project Stakeholders

The following Project stakeholders include the following key agencies, institutions and groups who must be informed about and engaged in the Project. These include stakeholders that may be affected by the Project or have an interest in Project activities. This list of stakeholders will be used to develop the consultation and validation of the Project concept and procedures during the inception period, but will be further detailed, as relevant, in the various Project areas, as set out in Section 5.

National Government Entities

Ministry of the Environment and Climate Change/Ministério do Meio Ambiente e Mudança do Clima (MMA): Decree 11.349/23 mandates the MMA with the preservation, conservation, and sustainable use of ecosystems, biodiversity, management of public forests for sustainable production, federal management of the Rural Environmental Registry (CAR), and regulatory and economic strategies for improving environmental quality and sustainable use of natural resources. The MMA' National Secretariat for Traditional Peoples and Sustainable Rural Development, oversees socio-environmental management, rural environmental policy, water access and use, and anti-desertification efforts relevant to the Caatinga. Additionally, the Extraordinary Secretariat for Deforestation Control and Territorial Environmental Regulation oversees deforestation and land use matters.

Brazilian Institute of the Environment and Renewable Natural Resources (IBAMA): IBAMA is the federal agency under the MMA, mandated to enforce environmental regulations and with the authority to oversee the implementation of national policies including, but not limited to: Environmental quality control and monitoring; authorizing natural resource use and management; and the issuing of environmental permits. IBAMA has state-level units in each of the PAs and will play a key role due to their expertise and competency, including in regards to protecting endangered species against poaching and other illegal activities.

Chico Mendes Institute for Biodiversity Conservation (ICMBio): Is a federal agency under the MMA, responsible for the oversight, protection, and regulatory compliance of 336 Federal Conservation Units including PAs involved in the Project. ICMBio identifies potential PAs for creation or expansion at the federal level, whereas state or municipal entities perform the same functions for PAs at those levels. PAs are ultimately established by laws passed at federal, state, or municipal levels. Established by Law No. 11.516/07, ICMBio's mission is to preserve the nation's biodiversity by promoting research and environmental monitoring, developing policies in coordination with communities adjacent to conservation units, organizing controlled public access, facilitating environmental education, and enforcing laws to prevent and mitigate environmental offenses, including forest fires. The agency's extensive experience and operational capacity in managing PAs are vital for identifying and establishing new conservation areas, as well as for enhancing the governance and ecological stewardship of existing ones within the Caatinga biome. Their collaborative efforts with local communities and emphasis on environmental education are further aligned with project aims.

Sub-national Government Administration

<u>Pernambuco State Secretariat of the Environment, Sustainability, and Fernando de Noronha (SEMAS):</u> SEMAS is mandated to oversee environmental policies and sustainability initiatives across the state of

Pernambuco. Created to enhance environmental governance, SEMAS emerged from the reorganization of the former Science, Technology, and Environment Secretariat. It is structured to foster integrated environmental management, leveraging the support of the State Environmental Council of Pernambuco (CONSEMA-PE) and financial backing from the State Environmental Fund (FEMA) and ICMS Socioambiental to underpin Pernambuco's Environmental Policy. SEMAS' mission to implement public environmental and sustainability policies aligns with the ARCA project's goals of conserving biodiversity and promoting sustainable development. Its activities, from coordinating state environmental policies to executing licensing and enforcement actions, directly influence the project's effectiveness in enhancing PA management and fostering sustainable resource use. The involvement of SEMAS and its affiliated agencies, like the Agência Estadual de Meio Ambiente (CPRH) and the administration of Parque Estadual Dois Irmãos, can significantly impact the project's outcomes by ensuring regulatory alignment and enhancing conservation efforts within the Caatinga biome.

Pernambuco State Environmental Agency for Water Resources (CPRH): Established by Complementary Law No. 49/03, CPRH acts as the environmental agency within Pernambuco, focusing on the protection, conservation, and applied research to environmental control activities, and facilitating the sustainable use of natural resources. As the state's lead agency for environmental licensing, monitoring, and enforcement, CPRH's expertise and regulatory capacity are key targets of any capacity-building activities. CPRH creates, expands, and manages PAs in the state of Pernambuco, depending on subsequent ratification by the state legislature. This includes expedited licensing for new PAs, effective management of existing ones, and enhancing the regulatory framework on biodiversity. Furthermore, CPRH's commitment to environmental education and its ability to mobilize and engage local communities will contribute to raising awareness and fostering sustainable natural resource management practices.

Bahia State Secretariat for the Environment (SEMA): SEMA has a broad mandate over environmental conservation and policy implementation within the state of Bahia. SEMA's responsibilities include managing PAs, enforcing environmental legislation, and promoting sustainable development. SEMA governs through collaboration with various collegiate bodies, such as the State Council for the Environment (CEPRAM) and the State Council of Water Resources (CONERH), which can facilitate stakeholder engagement, policy alignment, and resource mobilization, crucial for Project implementation and success. The potential impacts of SEMA's engagement in Project include ensuring regulatory compliance, enhancing the management effectiveness of protected areas within the Caatinga biome, and contributing to the sustainable use and conservation of natural resources.

Bahia Institute of the Environment and Water Resources (INEMA): An autonomous body within the state government of Bahia, established by Law No. 12.212/11, combining the Institute of Environment (IMA) and the Institute of Water and Climate Management (INGÁ). INEMA is tasked with implementing the State's Environmental Policy, Biodiversity Protection, Water Resources, Environmental Education, and Climate Change Policies. The creation of INEMA also unified the State Environmental Information System (SEIA) with the State Water Resources Information System (SEIRH), consolidating them into a single information tool, while maintaining distinct the collegiates of the State Environmental Council (CEPRAM) and the State Water Resources Council (CONERH). INEMA is responsible for the creation, expansion, and management of PAs in the state of Bahia, depending on subsequent ratification by the state legislature. Additionally, INEMA's experience in environmental education can bolster the Project's capacity-building efforts.

NGOs

<u>Caatinga Association:</u> The Caatinga Association conducts specific studies for the development of detailed proposals for the creation and management of PAs, assisting both the private and public sectors. The creation of Private Natural Heritage Reserves (RPPN) is a voluntary act by landowners invested in the protection of biodiversity and environmental heritage. To date, the Caatinga Association has contributed to the creation and support of 31 Private Natural Heritage Reserves - 29 federal and 2 state ones - in addition to supporting three public UCs. The Caatinga Association also supports the development and implementation of management plans. This line of action also develops studies to increase economic incentives for owners of Private Natural Heritage Reserves, such as payment for environmental services.

<u>Society, Population, and Nature Institute (ISPN):</u> A non-profit organization based in Brasília with an office in Santa Inês (MA). Since 1990, they have been working towards strengthening sustainable livelihoods and strategies for adaptation and mitigation to climate change, including as an implementing agency of GEF-funded programs. Starting from 2013, they have worked in the Amazon and Caatinga biomes.

Center for Advisory and Support to Workers and Alternative Non-governmental Institutions (CAATINGA): CAATINGA is an NGO focused on advancing family agriculture and securing rights for Brazil's Semiarid population, supporting climate resilience, food security, and family economy, enhancing farmers' abilities to produce sustainably and influence public policies. CAATINGA also promotes women's rights and gender equity, empowering female farmers and their organizations. Additionally, it engages in environmental citizenship and contextualized education, fostering active participation in environmental stewardship. CAATINGA's role is crucial for Component 3, as agroecological expertise and advocacy for sustainable practices will inform sustainable land management in PAs, while their focus on gender equity and environmental education aligns with empowering communities and promoting conservation.

Community Based Organizations

<u>Associação Quilombola de Conceição das Crioulas (AQCC)</u>: AQCC was founded in 2000, by agricultural producers and workers populating the *Conceição das Crioulas* settlement near Salgueiro, Pernambuco. Since 2003, AQCC has hosted the State Commission for the Articulation of Quilombola Communities of Pernambuco, making them a critical stakeholder for participatory socio-economic assessments.

<u>Central da Caatinga</u>: Many agricultural cooperatives are active in the Caatinga, prominently involving women in governance and biodiversity conservation in their activities. Central da Caatinga, formally established in 2016, represents a network of cooperatives and informal groups dedicated to the commercialization and processing of plant and animal products derived from sustainable extraction in the Caatinga biome. Its primary goal is to facilitate the marketing of cooperatives' and groups' production, thereby strengthening the presence of family agriculture in various markets and securing income for the families involved. Furthermore, their role in promoting gender equality and women's economic participation could be integral to the project's social inclusion goals.

Indigenous Peoples, Traditional Peoples, and Local Communities (IP/TP&LCs)

<u>Quilombola Communities</u>: Quilombos are communities generally founded and inhabited by the descendants of formerly enslaved peoples, who cohabitate and share cultural and productive practices. At least 1724 Quilombos exist in the Northeast region of Brazil, many of whom inhabit the Caatinga biome and are engaged in subsistence agriculture and communal resource-sharing. Strong and cooperative relationships are reportedly maintained with local Indigenous Peoples, but conflicts over land and other resources are known to occur between Quilombos and commercial farmers. Quilombos' productive activities and concentrated knowledge make them key stakeholders in the Project.

<u>Indigenous Peoples:</u> The Caatinga biome is populated by at least 45 indigenous communities (approximately 90.000 inhabitants), including the Tumbalala, Xukuru, and Pankararu peoples. They are crucial stakeholders in the Project, since engaging with these communities will integrate knowledge of productive activities, social relations, and cultural heritage into the project's activities, particularly in components aimed at biodiversity conservation and sustainable natural resource management.

Academia

<u>National Institute of the Semiarid (INSA):</u> Operating under the Ministry of Science, Technology, and Innovations since 2004, INSA promotes technological and social innovation for sustainable development in the semiarid zones. Its activities span across five axes: Coordination, Research, Training, Dissemination, and Public Policies, addressing key areas such as biodiversity, food science and technology, desertification, agroecology, energy, and water resources management.

4. Summary of any previous stakeholder engagement activities (2-3 pages)

Consultations prior to Project Implementation

A direct community consultation process was undertaken as part of ESMF/PF preparation in March 2024, with selected sample communities in four of the nine identified PAs, chosen to represent a cross section of the different types of communities in the area (Quilombola, artisanal fishermen, extractivists, caatingueiros, Fundo and Fecho de Pasto, family farmers, etc.).

These consultations were held in the local communities, in locations designated by the communities themselves (usually a local association or school), with representatives of key local institutions and unaffiliated community members. Each meeting began with a round of introductions followed by a brief summary explanation by the consultation team of the Project, its structure, financing, and key areas of action, as well as of the sorts of potential benefits and impacts it could potentially bring the community. These descriptions were intentionally kept simple and short, due to the Project's largely technical nature (largely focused as it is on the strengthening of management practices) and a desire to minimize descriptions of potential project benefits so as not to unduly raise expectations.

The groups overall appeared well-organized and informed, and virtually all had at least some ongoing projects and activities, some of them with external support. Participants were extremely engaged in the discussions, and expressed overall positive attitudes toward the Project, which they saw as an opportunity to address environmental challenges they are struggling with, such as water, waste, and fire management. There were few questions regarding the Project itself, although one participant raised the issue of the potential impacts of restrictions due to strengthened enforcement capacities on local communities (e.g., on artisanal subsistence hunting), even as the benefits of such reinforced compliance (e.g., in the combat against predatory hunting) was recognized. These issues promise to figure prominently in the participatory development of the PA Management Plans.

The discussions centered on the communities' concerns regarding their own environmental challenges and aspirations. The discussions were extremely focused and showed a cohesive understanding of both the causes and effects of diverse environmental problems, as well as ideas on ways in which the communities could be empowered to confront these challenges and take advantage of related income generating opportunities. The wide range of priority issues identified by each community suggests

that there is considerable potential for local buy-in for the proposed Project. The consultations further suggested the role that local communities can play in the identification and development of and participation in actions around key environmental issues. While many of the issues raised cut across virtually all the communities, each community tended to focus on one or two key issues that they felt to be most critical. They demonstrated a nuanced and holistic understanding of the multiple causes and effects of these issues and their proposals for addressing them were also multi-dimensional. One striking aspect of the interventions was their environment focus, which was not imposed by the consultation team but seems to come spontaneously from the participants.

The consultations revealed multiple vectors of conflict, perhaps the most serious involving issues around land, as land titling is uneven and some communities have CFI collective titles that are prone to intracommunity conflict. Land invasion (often by powerful plantation owners) and speculation are widespread, as are destructive uses of land (e.g., burning, predatory hunting, littering due to uncontrolled tourism, etc.) and the need for support in land titling was widely expressed.

In Lage dos Negros, there is an issue with powerful real estate interests encroaching on Cultural Heritage land and pressuring and applying pressure, harassment, and even threats Quilombola community leaders. Suggested actions included the creation of a Community Archive on the Cultural Heritage Site, support to environmental conservation activities, and training in income generation activities.

In Nova Canaã, land invasion, deforestation, conflicts around land speculation, access to water for animals, logging, predatory hunting, outmigration of local youth, and intra-community conflicts were the main issues cited, with land issues a dominant concern, coupled with deforestation by "invaders," who take advantage of the irregular tenure situation to engage in environmentally destructive practices. They expressed a need for legal advice to help them resolve these land issues. They also emphasized the importance of irrigation and their desire for an irrigation project on the perimeter of the settlement to help the local farmers produce beyond the level of subsistence, as well as concerns around the local river, which is used to water their animals. Current projects, such as a community garden, are in need of additional training and technical assistance to help identify and exploit income generating opportunities. Ecotourism was discussed as an income generating alternative, with local youth mobilized and encouraged to participate. The idea of a community workshop to help them plan, organize and better manage their internal conflicts was also raised.

In Brejo Dois Irmãos, the key concern was with fires in the dry season, which are largely created by local actors and chase away key local species (e.g., jaguars) and contribute to the drying of the river and decreasing yields of fruit trees. The community seeks training in fire prevention, the development of awareness raising programs, the formation of a local volunteer fire brigade, and technical support to the replanting of fruit trees, in part to help combat rising temperatures. The community has tried to plant buriti seedlings and is also seeking technical support to sustainable buriti farming. Other main priorities are revitalization of the local river, cleaning of lakes and streams, repopulating fish stocks, and the development of fish farming, as well as combatting predatory hunting by outsiders.

In Brejo da Quixaba and Brejo Bomfim (both consulted together), concerns centered around the local river, which is suffering from drought, trash (plastic bags, bottles, etc.), the use of pesticides, and the spread of a local plant that has in recent years become invasive (possibly due to climate change or the

loss of natural predators). They have made efforts to clean it with help from the surrounding communities but are hampered by others with less environmental awareness and want a more robust system of community litter prevention, waste collection, cleanup, and maintenance. They already have an environmental education and recycling project for youth that promotes selective collection and the production of crafts, painting and crochet from recovered materials, in the aim of generating income and protecting the local environment, with a dedicated locale, a registered association, and 60 local youth participating but they need additional technical support and training in environmental education and the preparation of replicators to work with surrounding communities in the wetlands to spread awareness of these issues and good practices for addressing them.

In Santo Inacio, the negative effects of uncontrolled tourism on local bodies of water was highlighted, including the leaving of trash by weekenders in springs and waterfalls, uprooting of plants, and writing of graffiti on ancient cave paintings. There is municipal trash collection but no proper final disposal (only burning and uncontrolled dumps), no selective collection, and raw sewage dumped directly into the river with no treatment or control of effluents. Fruit trees are being cut and destroyed. Uncontrolled exploitation of local sand is another concern, as well as waste management. The main demand was for an environmental education project with a focus on ecotourism, training of tour guides/environmental agents, and awareness raising for tourists, along with the development of a selective collection program and appropriate final disposal site, signage, and public information and warnings on fines for breaking environmental laws, starting with environmental training for local residents. Recovery of the river and other water bodies and preservation of local cactus were also priorities. The replanting of fruit trees (mangaba, murici, buruti, etc.) and investment in the processing of their fruits into sweets, liquor and other artisanal products, along with support to the growth and dehydration of medicinal plants for commercial sale, were also raised.

The needs, risks, and concerns expressed by project-affected stakeholders will inform future updates to project documents and implementation, as well as stakeholder analyses to be developed in the PIF phase.

Further virtual consultations with all current PA managers (except one, who will be consulted shortly) were also conducted.

The individual consultations held and their results are more fully summarized below (see Appendixes 2-2.4 for more information regarding consultations and their attendance).

Details of these meetings are found in the Project Stakeholder Engagement Plan (SEP).

A second round of consultations is planned in the 5 remaining PAs, to be completed by May 1st, with reporting and results included in the final version of the SEP and this EMSF.

Lage dos Negros, Campo Formoso, BA, PA Boqueirão da Onça (3/21/24)

Lage dos Negros is an officially recognized and registered Quilombola Traditional Community, consisting of some 2150 families. Quilombos were communities formed during Slavery by enslaved persons who managed to escape and seek refuge in remote and difficult-to-access areas, such as forests, mountains and wetland areas. The descendants of these Quilombos are today known as "Quilombola Communities." Like many Quilombola communities in Brazil, Lage do Negros is located at the foot of a mountain that

largely surrounds its territory. Part of this land is owned by the local Quilombola Women's Association and is recognized as a Cultural Heritage Site.

The Team was unable to organize a full community consultation meeting in the available time but had a very productive interview with a local community leader, Dona Hilda, member of the Women's Association and teacher at the local state elementary school.

The meeting took place at the school. We introduced ourselves and briefly explained the project, its phase of preparation, and potential impacts on and benefits for the local community.

Dona Hilda opened by saying that the demands of the community were many and that of a long list she would highlight a few key issues that she felt deserved special attention.

The Cultural Heritage Site is threatened by local real estate expansion and the Association has experienced increasing pressure and harassment to authorize occupation of the site, implying environmental destruction. Many species are already threatened, as are those who defend them. Ms. Hilta claimed that a price had been put on her head for not allowing the entry of real estate "entrepreneurs" and politicians with interests that did not align with those of the community.

According to Dona Hilda, the community's cultural heritage is also threatened, as there is no place to safely store its historical documents, writings, crafts, and other artifacts that preserve its ancestral heritage. She thus advocated the creation of a Community Archive on the Cultural Heritage Site as a possible project-supported activity. Support for environmental preservation was another potential line of action, as well as training in income generation activities. This would also be an excellent locale for cultural tourism, due to Lage dos Negro's rich history and cultural traditions, including festivals.

[Note: A full community consultation is planned with community leaders and residents of Lage dos Negros by end of April 2024, with results to be reflected in the final draft of this Plan to be submitted to the WWF Council.]

Nova Canaã Settlement, Remanso, BA, PA Lago do Sobradinho (3/23/24)

Founded some 20 years ago as a settlement by the Landless Movement (MST), Nova Canaã is today an extremely well-organized community of some 86 families. Perhaps in part due to the community's origins in a collective popular action movement, the meeting was extremely dynamic and participatory.

The main activity of residents is farming but there are various other activities and projects, including fishing, beekeeping, fabrication of cream cheese, sweets, fruit juices, liquor and caxaça.

The community demonstrated a strong awareness of environmental issues as well as of government services and projects. They know they are living in an environmental preservation area and understand the importance of preserving and protecting the local environment. They emphasized the importance of irrigation and their desire for an irrigation project on the perimeter of the settlement to help the local farmers produce beyond the level of subsistence.

There is a Municipal Government project and the Garden project, supported by PENAI, which is in need of training and technical assistance to help identify how the garden can generate income for the community. The Association wrote a proposal for a project to provide technical assistance to women but failed to get funding. They are currently writing a project for the PA.

Among the main challenges cited were land invasion, deforestation, conflicts around land speculation, access to water for animals, logging, hunting and the loss of local youth who are leaving for São Paulo in search of opportunity. Intra-community conflicts are also a major issue (there was general agreement on this). Despite the continuous involvement of the MST in the community, questions around the ownership of occupied land are a major concern. The community did a collective land title (CFI) several years ago, which complicates the land tenure situation and they want to complete the parceling of the settlement and the land tenure regularization process. Deforestation is a recurrent problem allegedly caused by "invaders," or persons who live and/or work around the settlement. When residents try to fight back, they are told that the land is not theirs, as they have no way of proving ownership. They view with some skepticism visits by INCRA (the National Institute of Colonization and Agrarian Reform) that fail to solve a problem that has been ongoing for many years. They expressed concern about the river running through the settlement, which is used to water cattle, goats and sheep, with access closed to outsiders.

This is a community with great potential beyond just agriculture. Ecotourism would be an alternative for generating income, as there are nearby waterfalls and trails. Local youth could be mobilized and encouraged to participate in such a program. The community is also in need of legal advice to help them resolve land tenure issues. The idea of a community workshop to help them plan, organize and better manage their internal conflicts was also discussed.

Brejo Dois Irmãos, Pilão Arcado, BA, PA Dunas e Veredas do Baixo Médio São Francisco (3/25/24)

This is a "Fundo de Pasto" Traditional community founded some 200 years ago and today home to approximately 200 families.

The meeting was held at the community school with teachers and representatives of the school and local community association as well as unaffiliated community members. The discussion was extremely focused, with various technical issues raised and discussed by community members. The community showed itself to be organized and active. This was the only community that had specific questions about the Project, which could potentially involve restrictions on local practice (e.g., artisanal hunting, firewood gathering, etc.) might bring (the answer given was that these issues would be treated in the participatory development of the Management Plan).

They engage in farming, fishing, small-scale subsistence hunting and largely live off of the extraction and processing of *buriti*; the predominant fruit in this marshy region. They have a well designed and maintained fruit processing facility, where they produce sweets, liqueur, *rapadura* and cachaça derived from sugar cane. They are also starting to experiment with beekeeping.

The community expressed great interest in local environmental issues. Their greatest concern was with fires in the dry season, which are largely created by local actors engaged in multi-generational slach-and-burn practices. The fires burn as far as Xique Xique and chase away the wildlife. Jaguars, for example, have

become much rarer and, while there are still pacas, armadillos, agoutis and deer, these are also threatened. The practice of burning has further contributed to the drying up of the river, which has become intermittent, and decreasing yields of the fruit trees. They expressed a desire for training in fire prevention, the development of awareness raising programs, the formation of a local volunteer fire brigade, and technical support to the replanting of fruit trees, in part to help maintain lower temperatures. The community has tried to plant *buriti* seedlings and is seeking technical support in sustainable *buriti* farming.

One of their greatest challenges is access. The only access to Lagoa do Padre requires several hours of dirt road and a stretch of soft sand, only passable by 4-wheel drive vehicles. They want to pave the access road but are also aware of the risks that greater access would entail, as they've already had problems with tourists littering and otherwise hurting the local environment. Although they have been part of the Light for All Federal Government program for universal access and use of electric energy to serve rural populations since 2005 they remain without electricity. They use small solar energy cells that cannot even run a fan. The PA Manager offered to help facilitate their interactions with COELBA (the electric company). They also have challenges with plantation owners invading their lands. They have a CFI Coletivo and lack private land titles. They want to combat predatory hunting, which is generally engaged in by outsiders. They also reported having never had contact with the PA Council or received information from them.

Among their stated priorities are revitalization of the local river, cleaning of lakes and streams, repopulating fish stocks, and the development of fish farming.

Brejo da Quixaba and Brejo Bonfim, Barra, BA, PA Dunas e Veredas Do Baixo Médio São Francisco (3/25/24)

These are two more Fundo de Pasto Traditional Communities, with 68 families and 72 families respectively.

These two communities were brought together into a joint meeting in Brejo da Quixaba. Both communities appeared well organized, both have a residents' associations, and both are socially and politically active. They are mainly farmers, growing corn, yucca, sugar cane and beans. They also use natural materials from the area to produce artisanal; goods.

Both communities have a relationship of affection for the local river that cuts through the wetlands, from which their ancestors have long drawn their livelihoods, concern for its quality and preservation, and desire to maintain and care for it for future generations. The river is suffering from the use of pesticides, which is killing fish. It has further become intermittent in certain stretches, due in part to the drought as well as the spread of a native plant that is increasingly blocking its flow to other communities (possibly related to climate change and/or the elimination of animals that traditionally fed on it). This blockage is causing the water to rise and flood surrounding fields and homes. It is also filled with trash (plastic bags, bottles, etc.) and in need of cleaning. They have made efforts to clean it with help from the surrounding communities but are hampered by others who have less awareness of or interest in these issues. They want a more robust system of community litter prevention, waste collection, cleanup, and maintenance.

In Quixaba, there is an environmental education and recycling project for children and teenagers that promotes selective collection, and the production of crafts, painting and crochet from recovered materials, in the dual aim of generating income and protecting the local environment. A locale has been built, an association has been registered and 60 local youth have signed up but they need further technical support and training.

They would like support from the Project in strengthening awareness raising, environmental education and the training of replicators who could eventually work with surrounding communities in the wetlands to spread awareness of these issues and good practices for addressing them.

Santo Inácio, Gentio do Ouro, BA, PA Lagoa de Itaparica (3/26/24)

The town is also known as Vila Santo Inácio ("The Lost City of Brazil"). The meeting was held in the local Women's Associação das Mulheres).

The community is well organized and works largely through its residents' associations, in partnership with public and private sector actors (one example being the wind energy company that operates in the region and is providing support to the community but is also creating certain challenges, such as the interruption of local springs. They also have a well-designed facility for producing crafts, hold crafts workshops, and sell craft products. The community members present expressed a strong awareness of their rich local natural resources and the need to preserve them.

Participants claimed that predatory tourism is destroying the rivers, waterfalls, springs and streams. People from neighboring municipalities, such as Xique-Xique and Barra, visit the springs on weekends and leave trash in the springs and waterfalls, uproot plants and other vegetation, and write graffiti on ancient cave paintings with no supervision by public authorities. This destructive tourism needs to be replaced by a more controlled form of tourism. Uncontrolled exploitation of local sand is also causing environmental impacts. There is municipal trash collection but no proper final disposal (only burning and uncontrolled dumps). There is no selective collection. Raw sewage from the town is dumped directly into the river that flows through the city with absolutely no treatment or control of effluents and continued inaction by local public authorities. Once plentiful fruit trees have been subjected to cutting and environmental destruction.

Their main demand was for an environmental education project with a focus on ecotourism, training of tour guides who can also serve as environmental agents, and the development of an awareness raising campaign for tourists, all starting with environmental training for local residents. Related actions would involve the development of a local selective collection program, appropriate signage, and public information and warnings on fines breaking environmental laws. Recovery of the river and other local bodies of water was another priority, as was preservation of the local cactus, implementation of selective waste collection and development of an appropriate final disposal site. The replanting of fruit trees (mangaba, murici, buruti, etc.) and investment in the processing of these fruits into sweets, liquor and other artisanal products (which are the main livelihood of many local families), as well as support to the growth and dehydration of medicinal plants for commercial sale, were also discussed.

Consultations with PA Managers

Discussions with the nine PA managers were more diverse and varied, including group virtual and one-on-one meetings, face-to-face meetings, and in some cases joint field trips. Discussions were wide ranging and included, various aspects of the project areas and local populations, key challenges in operations, and expectations for the future. The overall picture that emerged from these interactions was of a considerable unevenness among the various PAs in terms of staffing, material support, and funding, as well as of the training, knowledge, and experience of the managers themselves in safeguard-related issues. These differences will need to be taken into account in project implementation.

5. Stakeholder Engagement Plan

The purpose of this Stakeholder Engagement Plan (SEP) is to ensure the continuous and meaningful involvement of key project stakeholders in all phases of project implementation, supporting effective communication and productive working relationships around the common goal of preservation of the local environment. FUNBIO will ensure prior analysis of the environmental and social context of each PA, including a detailed stakeholder analysis, to help ensure that the views and inputs of all project-affected communities and stakeholders are taken into due consideration throughout the process and incorporated into project implementation to the greatest possible extent.

Planned Consultations during Project Implementation

Further consultations will be held in the 5 PAs not yet visited by May 1st, 2024, as well as in the eventual 10th PA to be created once it has been identified. As with the initial consultations held to date, these meetings will seek to inform the communities on and validate the Project and the present Plan via Free, Prior, and Informed Consent (FPIC) principles with key and project-affected stakeholders.

Further consultations will only take place once FUNBIO has established the project-specific GRM and assigned a designated Grievance Officer to manage it (i.e., within the first 3 months of Project implementation, as specified in Section 7 of this Plan). For these consultations, WWF-US and FUNBIO will, on approval of the Project, develop a plan for Project validation, and duly update all Project documents based on its results. The validation plan elaborated by WWF-US and FUNBIO will respect FPIC principles (as defined in the WWF-US Policy on Indigenous Peoples, Annex 7.58), including:

- Identifying potential risks to IP/TP&LCs with particular regard to the Project's effects on intangible cultural heritage assets, including Project-related disruptions to customary land and resource uses;
- 2. Dissemination of all available GRMs;
- 3. Digital and hard-copy transmission of relevant Project safeguards documents (as per WWF Standard on Public Consultation and Disclosure⁹), including but not limited to:
 - a. Environmental and Social Management Plans and Frameworks; and
 - b. The SEP.

⁸ WWF Policy on Indigenous Peoples, Annex 7.5

⁹ WWF Standard on Public Consultation and Disclosure

Throughout the remainder of Project implementation, the PA management teams shall maintain a continuous and multi-leveled process of stakeholder consultation and engagement with the communities, both within the PAs and in their buffer zones, that have been determined to be affected by Project-supported activities, via the processes and mechanisms outlined in this Plan, to ensure that they are satisfactorily and meaningfully engaged in the PA management process. Beyond this regular ongoing process, additional levels of community consultation will be required based on the following four criteria:

- 1. As part of the participatory preparation or revision of PA Management Plans and community-driven activities;
- 2. Where the design of a PA Management Plan implies social, economic or other risks or impacts toward to one or more local communities (no Plan may be approved before the draft has been consulted with affected communities to allow them to be adequately informed on it, to meaningfully engage with it, and to influence its content);
- 3. Where a new PA is created or an existing one expanded (in which case, all communities newly introduced to the PA must be consulted); and
- 4. In the case of Quilombola groups and other IP/TP&LCs, which shall be given an extra level of attention (as per this Plan and the ESMF).

At the time of Project inception, PAs already engaged in the development of PA Management Plans will be prioritized for consultation. Stakeholders in the remaining PAs will be consulted once their processes of participatory PA management planning have begun.

Following validation of concepts and related Project documents, and during participatory preparation or revision of PA Management Plans, the Executing Units will carry out stakeholder analysis in the selected Project areas to identify and reflect in the table template (see Appendix 1):

- Stakeholders likely to be affected by (whether positively or negatively) or interested in the Project,
- Stakeholder interest in the Project activities (whether in support or potential opposition, topics of particular interest),
- Project impacts on the stakeholder,
- Relative influence of the stakeholder,
- If relevant, requirements to apply the principle of FPIC in engagement and development of an Indigenous Peoples Plan (see text box below),
- Specific needs to ensure engagement with all relevant groups and that their views are represented, including those of men and women, the elderly and the young, and marginalized groups (as per FUNBIO's <u>Gender Mainstreaming Policy</u>, in which gender risks and inequalities of opportunity are identified, the associated plan must address such gaps),
- Preferred measures of engagement and measures to address potential constraints to stakeholder participation (e.g., effectiveness in use of electronic communication vs. other means, access to transport to attend meetings in person, etc.)

The Process Framework for the Project has special requirements for consultations and agreements with rights holders where resource use or access is affected, including boundary establishment. This will include mediation and dispute settlement measures and will form part of the specific stakeholder engagement plan for each relevant Area.

Box 1. Checklist for appraising whether an activity may require an FPIC Process

Will the activity involve the use, taking or damage of cultural, intellectual, religious and/or spiritual property from IPs?

Will the activity adopt or implement any legislative or administrative measures that will affect the rights, lands, territories and/or resources of IPs (e.g. in connection with the development, utilization or exploitation of mineral, water or other resources; land reform; legal reforms that may discriminate de jure or de facto against IPs, etc.)?

Will the activity involve natural resource extraction such as logging or mining or agricultural development on the lands/territories of IPs?

Will the activity involve any decisions that will affect the status of IPs' rights to their lands/territories/water resources, resources or livelihoods?

Will the activity involve the accessing of traditional knowledge, innovations and practices of indigenous and local communities?

Will the activity affect IPs' political, legal, economic, social, or cultural institutions and/or practices?

Will the activity involve making commercial use of natural and/or cultural resources on lands subject to traditional ownership and/or under customary use by IPs?

Will the activity involve decisions regarding benefit-sharing arrangements, when benefits are derived from the lands/territories/resources of IPs (e.g. natural resource management or extractive industries)?

Will the activity have an impact on the continuance of the relationship of the IPs with their land or their culture?

Will the interventions/activities restrict access to NTFPs, timber, lands, etc. and other sources of livelihoods and community resources?

In principle, all Project related information will be disclosed on http://www.funbio.org.br/, with exemptions outlined in FUNBIO's Information Policy. Information not available online may be provided by FUNBIO on request.

Based on the stakeholder analysis, the Project Management Unit (PMU), led by the Safeguards Specialist, will develop a site-specific Stakeholder Engagement Plan for a specific area or activity), incorporating the needs of the identified stakeholders and providing sufficient time and budget to enable meaningful engagement. The table below provides examples of the types of organizations that might be contemplated in these plans.

Table 1: Stakeholder overview

Stakehol Type	der	Name	Engagement During Project Implementation
Federal	and	MMA; ICMBio; IBAMA	The MMA's Secretariat for Biodiversity, Forests, and Animal Rights
State		SEMAS/CPRH (PE)	(SBio) will lead institutional and technical cooperation during Project
		SEIVIAS/CPRH (PE)	implementation, and will be represented on the Project Operational

Brazilian		Committee (POC) and Project Advisory Council (PAC) with a broader
Government		range of stakeholders. Regular meetings between the POC and PMU will be held to oversee Project implementation. ICMBio will also take part in POC meetings, and will be frequently engaged by FUNBIO via participatory consultations and meetings in their role assisting implementation of all Project Components in PAs at the federal level. FUNBIO will further engage with ICMBio with field visits to identify management-improvement solutions in relevant PAs, once formally established. As the federal agency mandated for enforcement of environmental laws and policies, IBAMA will also be occasionally represented on the PAC and invited to field visits to support the implementation of Component 2, namely. SEMAS and CPRH will assist the implementation of all Project Components for state-level PAs in Pernambuco. Both institutions will be represented on the PAC and be invited to field visits and consultations with project-affected communities, but CPRH will be prioritized as an implementation partner whereas SEMAS will inform regulatory compliance. FUNBIO will meet regularly with both institutions to oversee implementation of all Components as needed. FUNBIO will further engage with both institutions during field visits to identify management-improvement solutions in relevant PAs, once formally established.
	SEMA/INEMA (BA)	SEMA and INEMA will assist the implementation of all Project Components for state-level PAs in Bahia. Both institutions will be represented on the PAC and be invited to field visits and consultations with project-affected communities, but CPRH will be prioritized as implementation partner whereas engagement with SEMA will inform regulatory compliance. FUNBIO will meet regularly with both institutions to oversee implementation of all Components as needed. FUNBIO will further engage with both institutions during field visits to identify management-improvement solutions in relevant PAs, once formally established.
IP/TP&LCs in Project PAs	The Project will engage communities distributed across the 9 identified PAs, with vested socioeconomic and cultural interest in the sustainable management of the Caatinga biome.	Communities will be consulted in line with FPIC principles during project inception to validate the proposed project activities; adjustments will be made based on these consultations to ensure consensus and support. Furthermore, representation of IP/TP&LCs in the PAC will be obtained to ensure consistent engagement throughout implementation. The specifics of the FPIC process will be agreed to with communities as outlined in a separate Indigenous Peoples Plan. • Communities will be consulted and engaged in all project Components once outputs are mutually agreed (bullet point above): o Component 1: ICMBio, CPRH and INEMA, with support from FUNBIO as needed, will engage communities to co-develop participatory socioeconomic and land tenure assessments, and biodiversity surveys. o Component 2: ICMBio, CPRH and INEMA, with support from FUNBIO as needed, will engage communities through consultations and environmental education campaigns to ensure buy-in

Community Based Organization s (CBOs)	AQCC Central da Caatinga	for the implementation of National Action Plans for the Protection of Endangered Species. O Component 3: FUNBIO and MMA, as well as ICMBio, CPRH and INEMA, as needed, will engage communities through workshops, consultations, and other channels to provide technical assistance for the development of sub-grant proposals for community-led PA conservation and livelihood plans. O Component 4: MMA and FUNBIO will invite communities to project evaluation workshops, identifying lessons learned regarding the design, implementation, and E&S risk management performance of the executing agency and implementing stakeholders. FPIC will be followed according to the safeguard plans, and activities will be in accordance with Law to establish the National System of Nature Conservation Units, (Act 9985), the Law on Environmental Education (Act 9795), and the Decree to establish the National Strategic Plan for Protected Areas (Act 5758). Robust, project-specific grievance mechanism will be in place. Key CBOs (e.g., AQCC and Central da Caatinga) will be invited to participatory field visits and periodical consultations pursuant to the implementation of Components 1, 2, and 3. Specifically, ICMBio, CPRH and INEMA, in addition to MMA and FUNBIO, will hold
		workshops with key CBOs to: Elaborate communication and environmental education campaigns meaningful to project-affected communities; identify and develop meaningful community-led subgrant proposals, and; participate in Component 4 knowledge management and Project evaluation activities.
NGOs	Caatinga Association ISPN CAATINGA	Key NGOs will be invited to provide insight and support to various Project Components, including Component 4 and knowledge management activities, and membership on the PAC. Key NGOs Specifically, NGOs supporting the establishment and monitoring of PAs will be invited to field visits and workshops supporting the establishment of PAs and potential management-improvement activities with IP/TP&LCs (Components 1 and 3); NGOs supporting livelihood programming among Caatinga communities will be invited to workshops and field visits supporting Component 3 and the elaboration of community-led sustainability and livelihood programs;
Academia	INSA	FUNBIO will relevant academic stakeholders to field visits, and regular meetings to support activities under Component 1. FUNBIO will also invite academic stakeholders to PAC meetings where expert inputs are needed.

6. Resources and Responsibilities

The WWF GEF Project Agency is responsible for Project oversight. FUNBIO is responsible for executing the Stakeholder Engagement Plan and overall compliance with the WWF Standard on Stakeholder Engagement. WWF and FUNBIO must ensure that adequate budget and resources are allocated towards stakeholder engagement activities as outlined in this document, and as adjusted during the validation

period or regular review of procedures. The day-to-day assessments, plans and implementation will be carried out by the Executing Units, who must ensure adequate training and staffing to meaningful engagement.

FUNBIO will execute the project through a Project Management Unit (PMU), to be created within its organizational structure and will allocate the necessary human and technical resources needed for project execution. This will include a designated safeguards officer, with the authority to contract thematic specialists for compliance oversight regarding vulnerable populations including IP/TP&LCs, women, and other groups. This officer will be further responsible to ensure constant communication between Project stakeholders per this Plan, supporting the implementation and monitoring of the overarching Project and sub-grants and subordinate activities.

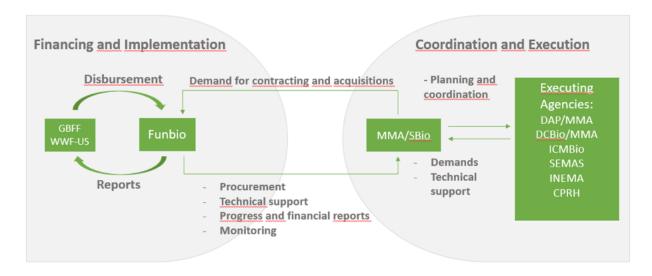


Figure 2. Project Institutional Arrangements

7. Grievance Mechanism

The GRM is designed to enable the receipt of complaints of affected women and men and public concerns regarding the environmental and social performance of the project. In short, the aim of the mechanism is to provide people fearing, or suffering, adverse impacts with the opportunity to be heard and assisted. It is designed to address the concerns of the community(ies) with a particular project, identify the root causes of the conflicts, and find options for the resolution of grievances. Therefore, it is an essential tool to foster good cooperation with project stakeholders and ensure adequate delivery of previously agreed-upon results.

This mechanism is designed to:

- Address potential breaches of WWF's policies and procedures;
- Be independent, transparent, and effective;
- Be accessible to project-affected people;
- Keep complainants abreast of progress of cases brought forward; and
- Maintain records on all cases and issues brought forward for review.

FUNBIO will be responsible for informing project-affected parties about available grievance mechanisms, including channels to the WWF GEF Agency and the GEF Secretariat. FUNBIO will apply the existing Grievance Mechanism as set out in Appendix 3, with potential updates to be adopted pending the 2026 review. GEF policy requires Category B projects to include a project-specific GRM. In the first 6 months of Project implementation and before the consultation of remaining PAs for Project validation, FUNBIO will therefore: Develop a project-specific GRM process, and appoint a Grievance Officer to oversee this GRM. This GRM will include specific mechanisms to mitigate accessibility concerns among stakeholders, such as the Internet shortages among project-affected communities, and will be overseen by the safeguards officer described in Section 6 of this Plan.

The FundBio Mechanism includes <u>four separate channels</u> in order to handle safeguard grievances, ethics issues, procurement challenges and independent lawyer. Issues received will be affirmed within a 10-day period, and a verification process will be initiated, as relevant. The procedures affirm the principles of non-retaliation against potential complainants, confidentiality and anonymity by limiting the availability of case information to Grievance Officer and members of the Ethics Committee. FUNBIO will, as part of detailing of stakeholder engagement in the inception period of the project, determine whether additional channels may be established in the project areas by the Executing Units, with reporting requirements to FUNBIO.

WWF GEF Agency GRM

Project-affected communities and other interested stakeholders may also raise a grievances at any time directly with the WWF GEF Agency, including when appealing a case managed by FUNBIO or grievances against FUNBIO's ethics or conduct more broadly. Contact information of the WWF GEF Agency will be made publicly available.

A grievance can be filed with the Project Complaints Officer (PCO), a WWF staff member fully independent from the WWF GEF Agency, who is responsible for the WWF Accountability and Grievance Mechanism and who can be reached at: Email: SafeguardsComplaint@wwfus.org.

Mailing address:

Project Complaints Officer Safeguards Complaints, World Wildlife Fund 1250 24th Street NW Washington, DC 20037

Complaints may be submitted in the Affected Party's native language and should include the following information:

- Complainant's name and contact information;
- If not filed directly by the complainant, proof that those representing the affected people have authority to do so;
- The specific project or program of concern;
- The harm that is or may be resulting from the project;
- The relevant Environmental and Social Safeguards policy or provision (if known);
- Any other relevant information or documents;
- Any actions taken so far to resolve the problem, including contacting WWF;
- Proposed solutions; and

• Whether confidentiality is requested (stating reasons).

The PCO will respond within 10 business days of receipt, and claims will be filed and included in project monitoring.

Stakeholders may also submit an anonymous complaint online or over the phone through an independent third-party platform:

https://report.whistleb.com/en/wwf.

GEF Secretariat GRM

Project-affected communities and other interested stakeholders may direct grievances in any language to the Conflict Resolution Commissioner (CRM) of the GEF Secretariat. Grievances must be expressed in writing, explain the nature of alleged harms and risks, and identify relevant GEF-funded projects, partners, and other stakeholders where relevant. The CRM also respects any and all requests for confidentiality or anonymity made by stakeholders reporting grievances.

Project-affected communities and other interested stakeholders may direct grievances through the following channels:

Contact Address

Mr.		Peter	Lallas
GEF	Conflict	Resolution	Commissioner
E-mail: plalla	as@thegef.org		

Mailing Address:

.v.a / va	u. C55.				
Mr.		Р	eter		Lallas
Global		Envi	ronment		Facility
The	World	Bank	Group,	MSN	N8-800
1818		Н	Street	t ,	NW
Washingtor	n. DC 20433-002				

The GRM outlined in this Plan must be shared, including all GRM channels available to stakeholders, at every stakeholder engagement or consultation for the duration of Project implementation. This may take different forms depending on the stakeholders being engaged with, including but not limited to visual presentation, advertising in project-affected communities, and verbal announcements.

8. Monitoring and Reporting

Progress against the Stakeholder Engagement Plan will be monitored and reported on throughout implementation by FUNBIO. The following comprises the monitoring and reporting activities to be undertaken with respect to stakeholder engagement by FUNBIO:

- The SEP will be periodically reviewed and updated as necessary at an annual Reflection Workshop.
 The review will ensure that the list of project stakeholders and methods of engagement remain appropriate.
- Activities related to stakeholder engagement will be documented and reported by the FUNBIO every 6 months in a Project Progress Report (as part of regular reporting). The project Results

Framework and Annual Work Plan and Budget will track beneficiaries of the project and activities related to the Stakeholder Engagement Plan.

- Stakeholder Engagement activities and progress will be monitored through the following indicators:
 - GEF Core Indicator 11: Number of direct beneficiaries disaggregated by gender as cobenefit of GEF investment
 - Indicator SEP 1: Number of government agencies, civil society organizations, private sector, indigenous peoples and other stakeholder groups that have been involved in the project implementation phase on an annual basis
 - o <u>Indicator SEP 2</u>: Number persons (sex disaggregated) that have been involved in project implementation phase (on an annual basis)
 - o <u>Indicator SEP 3</u>: Number of engagements (e.g. meeting, workshops, consultations) with stakeholders during the project implementation phase (on an annual basis)

Stakeholder Engagement will be evaluated by **independent consultants** recruited for the project midterm and terminal evaluation.

The **WWF GEF Agency** will undertake annual supervision missions to ensure compliance, and report on progress against the Stakeholder Engagement Plan annually to the GEF through Project Implementation Reports.

Appendix 1: Stakeholder Analysis Template

Appendix 2: Systematic Documentation of Stakeholder Consultations

Date	Description of	Venue	Objective of the	Summary of Meeting Outcomes	Participants
	Consultation		Consultation		
21/03/2024	Interview	Local Elementary School, Lage dos Negros, Campo Formoso (BA), PA Boqueirão da Onça	Presenting project activities, procedures, and intended outcomes; assessing needs,	 Lage dos Negros is a recognized Quilombola community with 2150 families, located at the foot of a mountain, with part of its land owned by the local Quilombola Women's Association and recognized as a Cultural Heritage Site. Consultation with community leader, Dona Hilda, revealed key issues including threats from real estate expansion to the Cultural Heritage Site and environmental destruction. Dona Hilda has faced pressure and threats for defending the community's interests against real estate and political pressures. The community's cultural heritage is at risk with no safe place to store historical documents and artifacts. Dona Hilda suggested creating a Community Archive on the Cultural Heritage Site, support for environmental preservation, training in incomegenerating activities, and promoting cultural tourism as potential project-supported activities. 	WWF-US & FUNBIO consultation team; Dona Hilda
23/03/2024	Public consultation	Nova Canaã Settlement, Remanso (BA) PA Lago do Sobradinho	impacts, and potential risks to project-affected communities.	 Nova Canaã Settlement in Remanso, BA, founded by the Landless Movement (MST), consists of 86 well-organized families engaged in farming and other activities like fishing, beekeeping, and producing cream cheese, sweets, and liquors. The community has a strong environmental awareness and a desire for an irrigation project to boost farming beyond subsistence level. They've proposed projects for technical assistance, particularly for women, but have struggled with funding. Challenges include land invasion, deforestation, conflicts over land speculation, water access, logging, hunting, and youth migration seeking opportunities elsewhere. Intra-community conflicts and land tenure issues, including the need for land regularization and skepticism towards INCRA's ineffective visits, are significant concerns. 	WWF-US & FUNBIO consultation team; INEMA; Municipality of Remanso (environmental unit); Evangelist minister; Associação Burití; community residents;

			They see potential in ecotourism, with local waterfalls and trails, and		
			express a need for legal advice on land tenure and a community workshop		
			to manage internal conflicts better.		
25/03/2024	Public consultation	Local School, Brejo Dois Irmãos, Pilão Arcado (BA) PA Dunas e Veredas do Baixo Médio São Francisco	 Brejo Dois Irmãos in Pilão Arcado, BA, is a "Fundo de Pasto" Traditional community with about 200 families, existing for 200 years. The community, engaged in farming, fishing, small-scale hunting, and processing buriti fruit, is organized and concerned about environmental issues. Main concerns include dry season fires by local actors, endangering wildlife and drying up the river, and decreasing fruit yields. They seek training in fire prevention, forming a volunteer fire brigade, and technical support for sustainable farming and replanting fruit trees. Challenges include difficult access, with desires to pave the access road balanced against risks of increased tourism and environmental harm. Despite being part of the "Light for All" program, they lack electricity, using insufficient solar energy cells. They face issues with land invasion by plantation owners, lack of private land titles, and have had no contact with the PA Council. Priorities include revitalizing the local river, cleaning lakes and streams, repopulating fish stocks, and developing fish farming. 	WWF-US FUNBIO consultation team; IN Associação Burití; Associação Quixaba	& EMA; de
25/03/2024	Public consultation	Brejo da Quixaba and Brejo Bonfim, Barra (BA), PA Dunas e Veredas Do Baixo Médio São Francisco	 Brejo da Quixaba and Brejo Bonfim in Barra, BA, are "Fundo de Pasto" Traditional Communities with 68 and 72 families respectively, engaged in farming and artisanal goods production. Both communities, which have residents' associations and are socially and politically active, held a joint meeting expressing concern for the local river's preservation. Challenges include pesticide use affecting fish populations, river intermittency, blockage by native plants causing flooding, and trash pollution. Efforts to clean the river are hindered by lack of community awareness and interest from others. Quixaba hosts an environmental education and recycling project for youth, focusing on selective collection and crafts from recovered materials, needing technical support and training. 	WWF-US FUNBIO consultation team; IN ABDIPA; Associação Quixaba	& EMA; de

26/03/2024	Public consultation	Local Women's Association, Santo Inácio, Gentio do Ouro (BA), PA Lagoa de Itaparica	 They seek Project support for awareness raising, environmental education, and training of replicators to promote good practices in surrounding communities. Santo Inácio in Gentio do Ouro, BA, known as "The Lost City of Brazil," discussed the community's organization and collaborations, including with a wind energy company. They expressed concerns over predatory tourism damaging local rivers, waterfalls, and ancient cave paintings, and the need for controlled tourism. Challenges include uncontrolled sand exploitation, improper trash disposal, and raw sewage dumping, leading to environmental degradation and fruit tree cutting. The community seeks an environmental education project focusing on ecotourism, tour guide training as environmental agents, and tourist awareness campaigns. Other needs include developing local selective waste collection, signage 	WWF-U FUNBIO consulta team; Santo educato Municip	ntion INEM/ Ináci rs;
			 Other needs include developing local selective waste collection, signage and information on environmental laws, river and water body recovery, cactus preservation, and fruit tree replanting for artisanal product production. 		

LISTA DE PRESENÇA-LEUNIÃO PARA CLABOLAÇÃO DO PROJETO ALA 23 à 27 de março de 2024 - Gentil do amo-84-26/03/2064 Nome 1- Candida Beating de silve lune JNem A

inema

LISTA DE PRESENÇA REUNIÃO ORDINÁRIA APA LAGO DE SOBRADINHO

Brifo das Smais - aina e Vendos

Projeto ARCA, com o MMA e a executor o FUNBIO, o projeto tem previsão de recurso de US\$ 5 milhões (25 milhões de reais), com objetivo de Melhorar a Conservação da Caatinga, por meio da expansão da efetividade de gestão do Sistema Nacional de Conservação (SNUC) e do engajamento de populações tradicionais e comunidades locais (PT&CL), aumentando a resiliência da biodiversidade e melhorando os meios de subsistência. O componente de trabalho é o de melhoria da Efetividade de Gestão em UCs.

DATA: 23 à 27

LOCAL: Remanso, Pilão Arcado, Barra e Xique-Xique

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Appendix 2.1: Attendance Sheets for Nova Canaã Settlement, 23/03/2024 Consultation

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Appendix 2.2: Attendance Sheet for Brejo Dois Irmãos, Pilão Arcado, 25/03/2024 Consultation

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LISTA DE PRESENÇA REUNIÃO ORDINÁRIA APA LAGO DE SOBRADINHO

25/03/2024

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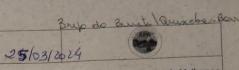
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Appendix 2.3: Attendance Sheets for Brejo da Quixaba and Brejo Bonfim, 25/03/2024 Consultation

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Appendix 2.4: Attendance Sheet for Gentio do Ouro, 26/03/2024 Consultation

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POLICY FOR GRIEVANCES MADE TO THE BRAZILIAN BIODIVERSITY FUND - FUNBIO

P-17/2018

Department Responsible: Legal Counsel

OBJECTIVE:

Establishes the institutional grievance policy for deviations from ethical conduct, safeguard violations and others in relation to projects funded by FUNBIO.

ORGANIZATIONAL SCOPE:

This policy applies to the entire organization, its partners, and suppliers.



APPROVAL

Current Version	Action	Date
4	Approval	Apr 29, 2021
	Validity start date	Apr 29, 2021
	Next revision	Apr 2026

CONTROL OF VERSIONS

Version	Date	Person Responsible	Status
0.1	Feb 14, 2013	Flávia Neviani	Draft
0.2	Feb 28, 2013	Jacqueline Ricarte	Revised
1	Mar 1 st , 2013	Rosa Lemos	Approved
2-draft	Oct 19, 2018	Alexandra Leitão, Fábio Leite and Flávia Neviani	Draft
2	Nov 29, 2018	Advisory Board	Approved
3-draft	Nov 19, 2020	Flávia Neviani	Draft
3-draft	Feb 10, 2021	Fabio Leite, Alexandra Leitão, and Rosa Lemos	Revised
3	Apr 29, 2021	Advisory Board	Approved
3.1	May 29, 2023	Flávia Neviani	Revised
4	May 30, 2023	Rosa Maria Lemos de Sá ¹	Approved

RELATED DOCUMENTS:

- FUNBIO Ethics Code
- Grievance Operational Procedures
- FUNBIO Employee Handbook
- Social and Environmental Safeguards Policy



¹ Approval of the update pursuant to the resolution of the 67th Ordinary Meeting of FUNBIO's Advisory Board, held on 08/25/2022: "3) "The Advisory Board, unanimously, delegates to the Secretary General the competence to analyze and approve updates in the Institutional Policies and Code of Ethics that do not imply substantial modifications or scope reduction."



CONTACT INFO:

FUNBIO's Legal Counsel can be contacted by e-mail: <u>asjur@funbio.org.br</u>

The Ethics Committee can by contacted by e-mail: comite.etica@funbio.org.br

Privacy:

This document is public and will always be available on Funbio's website. It must not be edited or altered without prior consent.



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I. INTRODUCTION AND OBJECTIVES

- 1. FUNBIO is committed to transparency and recognizes its importance as a guiding principle in its operations. One way to promote transparency is to be open to complaints from people who feel affected by FUNBIO's operations and projects, as well as reports of breaches of the Code of Ethics² or Brazilian law.
- 2. This policy defines how FUNBIO receives any and all grievances that may be made, as well as how each of them is dealt with. Finally, this policy defines the roles that different sectors of FUNBIO will play in this regard.
- 3. The main objective of this policy is to ensure the effectiveness of FUNBIO's Code of Ethics and its Environmental and Social Safeguards Policy.
- 4. Grievances that are not linked to project safeguards will be directed to the responsible areas within FUNBIO.

II. DEFINITIONS

- Complaint: This is a voluntary act of reporting any dissatisfaction with FUNBIO's procedures or failure to comply with existing procedures, including malpractice, considering the provisions of the Environmental and Social Safeguards Policy - P 24/2020 and/or those adopted by the Project's donors.
- 6. **Report**: A voluntary act of reporting any fact related to the misconduct of ethical bearing in violation of FUNBIO's Code of Ethics, cases related to Policy P-44/2022- Policy on measures to protect against abuse, harassment, and sexual exploitation (SEAH), and/or Brazilian law.
- 7. **Protests:** Type of complaints or grievances that are objections made by proponents participating in FUNBIO's selection processes regarding non-compliance with FUNBIO's Procurement Policy P-31/2014.
- 8. **Ethics Committee**: is a board established by FUNBIO with the responsibility of ensuring compliance with the rules established in the FUNBIO Code of Ethics and other related policies.



² FUNBIO's Code of Ethics can be found on FUNBIO's website (www.funbio.org.br)



- 9. **Safeguards**: A set of planned, usually precautionary, actions to prevent projects supported by FUNBIO from having negative social and environmental impacts, whose frameworks are established in P 24/2020 or in specificities established by project donors.
- 10. **Safeguard Grievance Officer**: the person responsible for the Grievance System (GS).
- 11. **Grievance System (GS)** an independent and exempt mechanism that reports to the Management Committee of FUNBIO's Advisory Board. The GS contains a channel for receiving, processing, and addressing complaints, claims and conflicts related to FUNBIO's socioenvironmental safeguards in its projects, with the aim of ensuring compliance with the safeguards.
- 12. **Protest focal point**: this is an internal FUNBIO unit assigned to analyze protest demands and provide them with appropriate answers and referrals.

III. FUNBIO GRIEVANCE CHANNELS

13. FUNBIO offers two main grievance channels:

Channel	Contact	When should it be used
Safeguard grievances	gs@funbio.org.br	To report grievances related to FUNBIO's procedures or the negative effect of projects (safeguards)
Ethics Committee	comite.etica@funbio.org.br	Priority channel to report misconduct according to FUNBIO's Code of Ethics
Protests related to Procurement Processes	protesto.compras@funbio.org.br	Participants in procurement processes who understand that FUNBIO's procurement policy was not observed during a specific process
Independent lawyer's office	(21) 99552-7445 denuncia.etica@funbio.org.br	Channel to be used only when there is a report against the Secretary General or some member of the Ethics Committee or for an anonymous report.



- 14. Upon receiving a grievance, we will evaluate if it has been sent to the correct channel. If the complainant/whistleblower uses the wrong channel, he/she will be directed to the appropriate officer at FUNBIO. Example: if a report on ethical misconduct is sent to the grievance channel (in this case the wrong channel) it will be forwarded to the Ethics Committee by the head of the grievance channel, and vice versa.
- 15. The grievance channels should be easily accessible on the FUNBIO website.
- 16. In the case of projects with safeguards, the grievance channel should be disclosed to those who may be affected by project implementation.
- 17. In the case of projects where FUNBIO acts as the implementer rather than the executor, especially in GEF/GCF Implementing Agency projects, FUNBIO shall require the executor to have and disclose its own safeguards grievance channels.

IV. EXPECTATIONS BY THE COMPLAINANT/WHISTLEBLOWER ON HOW FUNBIO WILL HANDLE THE SITUATION

IV.1 RESPONSE

- 18. Any grievance sent to one of FUNBIO's channels will be answered except:
- a. Advertisements/spam received by FUNBIO channels
- b. FUNBIO inquiries (e.g., "how do I submit a project or my resume")
 - 19. The fact that FUNBIO responds does not imply tacit agreement with the grievance, each case will be reviewed in accordance with FUNBIO's procedures and its Code of Ethics.
 - 20. FUNBIO does not have a stipulated deadline for replies, but a 10-business-day period is considered appropriate for confirmation that the grievance was received and recorded and that verification procedures will commence.



IV.2 NON-RETALIATION

- 21. FUNBIO is committed to protecting its employees and partners from unlawful discrimination or retaliation as a result of providing information or participating in investigations involving allegations of unethical misconduct or suspected violation of the law or regulation of any jurisdiction, domestic or foreign, where FUNBIO does business, or FUNBIO Policies, by any employee.
- 22. Any form of retaliation that a complainant/whistleblower perceives should be reported as soon as possible to the Ethics Committee through the channel defined in section III of this document.

IV.3 CONFIDENTIALITY AND ANONYMITY

- 23. Whenever possible, the confidentiality and anonymity of grievances will be maintained automatically, being known only to the grievance officer and the members of the Ethics Committee.
- 24. Reports made anonymously will also be cleared, however, in order to provide a response, some form of contact must be provided (may be an email that does not identify the complainant/whistleblower).
- 25. However, for cases where the investigation can identify (even if not directly) the complainant/whistleblower, he/she may ask to remain anonymous, i.e., only the grievance officer or the members of the Ethics Committee will know his/her identity. Their responsibilities include a commitment to maintain confidentiality whenever required.
- 26. It should be noted that depending on the grievance it may be difficult to remain anonymous for the case to be investigated. In these cases, FUNBIO will contact the complainant/whistleblower to see what can be done.
- 27. FUNBIO's intention is to clarify, as best as possible, all cases coming through these channels, but a complainant/whistleblower's desire for anonymity must be respected in principle and will be greater than the need for investigation if both conflict.

IV.4 ANTI-EMBARRASSMENT AND GENDER CONSIDERATIONS

28. FUNBIO understands that victims of harassment or discrimination may be



FUNBIO embarrassed to make complaints. To avoid and mitigate this possibility



- FUNBIO declares that employees who receive these grievances are trained to avoid embarrassing anyone.
- 29. Women may request that contact with the grievance officer or the Ethics Committee always be made with other women, we suggest that in these cases the first contact be made following the example below:

"I would like to make a complaint, but first I would like my contact from now on to always be with a woman"

- 30. If the grievances officer is not female and a message with this request is sent, it will be dealt with exceptionally by the Ethics Committee through one of its female members.
- 31. Any other type of embarrassment can be dealt with and, as far as possible and reasonably, before any complaint/report is made.

V. FUNBIO'S EXPECTATIONS RELATED TO THE GRIEVANCES

- 32. FUNBIO's intention is to clarify complaints and investigate grievances in a transparent and fair manner. To make this possible, any grievance must contain as many facts and evidence as possible.
- 33. Cases that are not based on facts or evidence will also be investigated, but the ability to verify may be compromised, also compromising the resolution of the case.
- 34. FUNBIO opens these channels to everyone and expects them to be used responsibly. Numerous repeated messages, assaults, or any attempt to embarrass, hinder, or delay the work of those involved in investigating these cases will be reported to the Ethics Committee and, when necessary, to the appropriate authorities.
- 35. Anyone who knowingly produces a false report or evidence that he or she knows to be false will not be protected by this Policy, and may:
- a. Receive disciplinary action (in the case of FUNBIO employees), including the possibility of termination of his/her employment contract.
- b. Have his/her contract canceled in case of consultants and service providers.
- c. Be vetoed from future hires by FUNBIO or FUNBIO funded projects.



d. Be sued in court if FUNBIO deems it necessary.



e. The case may be referred to the Board if the false report is made by a member of the Board.

V.1 How grievances are handled

- 36. The process of receiving, resolving, following up and closing each grievance shall be supervised by FUNBIO's Internal Audit, reporting directly to the Advisory Board.
- 37. Initially, the Internal Audit will not have access to grievances, but will be advised that a grievance exists and will monitor whether the responses are provided efficiently to the complainants.
- 38. A "public report" on grievances received will be prepared annually, without information that could compromise the complainants/whistleblowers. This document will be published on FUNBIO's website and additional forms of dissemination may be used.