

ESMS Clearance of Project Proposal

Project Data

Data for the fields below are copied from the Screening Report

Project Title:	Continental wetlands adaptation and resilience to climate change		
Project proponent:	IUCN		
Executing agency:	Mauritania National Great Green Wall Agency, Direction des Aires Protégées et du Littoral		
Funding agency:	GEF / LDCF		
Country:	Mauritania	Contract value (add currency):	4,449,541 (in \$)
Estimated start date and duration:	Project duration 48 months	Amount in CHF:	4.493.950
Has a safeguard screening or ESIA been done before?	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no	Provide details:	

ESMS Screening Report


Data for the fields below are copied from the Screening Report

Risk category:	<input checked="" type="checkbox"/> low risk <input type="checkbox"/> moderate risk <input type="checkbox"/> high risk
Rationale Summarize findings from the questionnaire and explain the rationale of risk categorization	<p>The project aims at restoring wetland ecosystems for climate change adaptation and resilience. Because these wetlands are important for pastoralist livelihoods, restoring these ecosystems is expected to generate not only environmental but also social benefits by reducing the vulnerability of pastoralists' livelihood to climate change. Further positive impacts are expected for the local population as the project will promote income generating activities aimed in particular to benefit vulnerable groups, women and young people.</p> <p>The project follows a participatory approach for resource management, evidenced, among others, through its objective to define and implement a participatory wetland management plan. This element was the subject of special consideration during the process of developing the national wetland strategy. The involvement of the communities living in the wetland sites and in particular the pastoral groups in defining the plan will allow addressing their needs and concerns and will also strengthen their ownership.</p> <p>While a few social risks have been identified (see section B and C), it is considered that these are either already addressed by the project or can be readily addressed when finalizing the detailed project design during the PPG phase. It should also be noted that a few issues as specified in sections B and C below deserve further analysis – to be included in the ToR of the PPG consultant(s).</p> <p>Environmental impacts are expected to be exclusively positive with one minor risk related to invasive species which is expected to be readily addressed through appropriate handling procedures (see section B4).</p> <p>Risks related to the project failing to appropriately address impacts from climate change are considered low as it is the project's explicit intention to reduce vulnerabilities to climate change. However, the PPG needs to ensure that climate scenarios and their impacts on water resources are well taken into consideration (see section D).</p>
Required assessments or tools	<input type="checkbox"/> Full Environmental and Social Impact Assessment (ESIA) <input type="checkbox"/> Partial Environmental and Social Impact Assessment (ESIA) <input type="checkbox"/> Social Impact Assessment (SIA) <input type="checkbox"/> Environmental and Social Management Plan (ESMP) <input type="checkbox"/> Environmental and Social Management Framework (ESMF) <input checked="" type="checkbox"/> Other: Socio-economic context analysis including gender

Required actions for gender mainstreaming	<p>The PIF describes the project’s intention to promote gender equality and indicates the plan to undertake, as part of project preparation, an assessment of needs of all men and women involved in the project. In order to improve gender responsive project design, the following recommendations are made by the screening team:</p> <ul style="list-style-type: none"> • Undertake a targeted gender analysis – as integral part of the socio-economic context analysis of the selected intervention sites - to review the project and its context systematically on potential risks of affecting women as well as identifying opportunities for women empowerment. • Ensure ample consultation of women in gender analysis; • Examine gender roles in natural resources management, differences in access to and control over resources and women’s representation in governance processes and bodies; • Identify needs, barriers and potential disadvantages women face; • Explore women’s skills and knowledge specific to resource management and development opportunities; • Integrate specific gender measures to address identified issues in the project design; this might include <ul style="list-style-type: none"> ○ Measures to ensure equitable presence of women in advisory or decision-making bodies set up or supported by the project; ○ Capacity building in identified technical areas or aiming more generally at empowering women; ○ Measures to strengthen of women’s rights, in particular related to ownership or access to land and other production factors; ○ Measure to enhance the economic and social benefits to women; component 2 which aims at supporting alternative income generation offers ample opportunities for providing tangible benefits, e.g. related to market gardening, poultry farming, renewable energy for micro-economy, development of local products, ecotourism etc. ○ Provide gender specific indicators for the results framework. 	
ESMS Standards	Trigger	Required tools or plans
Involuntary Resettlement and Access Restrictions	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no <input type="checkbox"/> TBD	<input type="checkbox"/> Resettlement Action Plan <input type="checkbox"/> Resettlement Policy Framework <input type="checkbox"/> Action Plan to Mitigate Impacts from Access Restriction <input type="checkbox"/> Access Restrictions Mitigation Process Framework
Indigenous Peoples	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> TBD	<input type="checkbox"/> Indigenous People Plan
Cultural Heritage	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> TBD	<input checked="" type="checkbox"/> Chance Find Procedures
Biodiversity Conservation and Sustainable Use of Natural Resources	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no <input type="checkbox"/> TBD	<input type="checkbox"/> Pest Management Plan

ESMS Clearance of Project Proposal

The fields below are completed by the IUCN ESMS reviewer at Clearance stage

	Name	Organization and function	Date
IUCN ESMS Reviewer Clearance Stage:	Olivier Hamerlynck	Independent ESMS Consultant	28/02/2018
	Linda Klare	ESMS Coordinator , IUCN	28/02/2018
	Title	Date	
Documents submitted at Clearance Stage:	2018.02.13_ProDoc_8033_Continental_wetlands_Mauritania_Final	13.2.2018	
Have findings from ESIA triggered any changes (e.g. risk level or Standards triggered)	<p>The PPG has contributed to clarifying the triggering decision of the following Standards:</p> <p>Indigenous People: has changed from TBD to No (see explanation in checklist).</p> <p>Cultural Heritage: triggered, but low risk which is expected to be managed through the confirmed adherence to the chance find procedures.</p>		
CLEARANCE DECISION			
<input checked="" type="checkbox"/> Cleared	<i>The conclusions are positive and the project proposal meets all requirements with regards to avoiding or reducing environmental and social risks: the proposal is accepted.</i>		
<input type="checkbox"/> Conditionally cleared	<i>The conclusions call for improving one or more ESMS activities and/or for important re-formulation of some mitigation measures. This will lead to the proposal being conditionally cleared; the reviewer will provide guidance on the way forward.</i>		
<input type="checkbox"/> Clearance rejected	<i>Essential ESMS provisions have not been complied with, critical mitigation measures have not been incorporated or don't seem feasible or sufficient for avoiding or minimizing impacts; or significant data gaps still prevail and additional field assessments are required.</i>		
Rationale – Explain clearance decision (why cleared, conditionally cleared or rejected) – no need to provide a summary of the findings from the checklist (Annex A)	<p>The project document has clearly addressed the main issues raised in the ESMS screening report with adequate development of the socio-economic context and the power relations in the area. The climate change analysis was also improved.</p> <p>In order to manage low risks related to unknown, buried cultural resources, project management needs to ensure that chance find procedures are put in place and communicated to all relevant project staff and partners involved in excavation or movement of earth given that South-eastern Mauritania has yielded finds from various epochs and cultures.</p>		
Clearance conditions (when conditionally cleared, e.g. tasks to be completed during inception phase):	n/a		
Approval ESMS Clearance			
Name	Function	Date	Signature
Jean-Yves Pirot	Director GEF and GCF Coordination Unit, IUCN	6 March 18	

Annex A: Checklist for Clearance of Project Proposal

This checklist is completed by the ESMS Coordinator in consultation with the IUCN ESMS Expert team. The purpose of the appraisal is to check whether the project and its ESMP have incorporated adequate measures to avoid, minimize or compensate for potential social and environmental impacts and that a suitable mechanism is conceptualized that assures implementation of mitigation measures and monitoring of their effectiveness. Some questions may not be applicable for the appraised project and hence should be marked with n/a.

	Yes, no, n/a	Comment
General appraisal of project proposal and process of stakeholder engagement		
1. Have the ESMS procedures on stakeholder consultation been properly applied during project design and ESIA and resulted in effective engagement of relevant stakeholders, including affected groups? ¹	Yes	The proponents have gone a long way into the stakeholder analysis and have clearly identified the vulnerable groups (women, youth, haratin) and have involved the relevant national agencies. The proponents have also identified, recognised and linked up with the traditional power system (the various fractions of the Kunta and other important tribes), the “notables” whose involvement and engagement is essential. The intended beneficiaries will be the drivers of the intervention with special attention to the most vulnerable ones. The final design and choices of what to do, where and how will be their remit.
2. Have required disclosure of information been made in a culturally appropriate way (moderate or high risk projects only)? ²	N/A	
3. Have potential data gaps (e.g. identified by ESMS Screening) been filled through baseline studies, where relevant?	Yes	The analysis of the socio-economic context and the risks to women and vulnerable groups (tenure, access restrictions) has been picked up and appropriately dealt with. The climate related data gaps have also been addressed though uncertainty remains high.
4. Have the recommendations from the ESMS Screening and/or ESIA been incorporated in the project proposal?	Yes	See ESMS Report in appendix 5
5. Has advice from Screening or ESIA on the development of mitigation measures been followed? Are they presented as project activities or in form of an ESMP? (Note: do not provide details about measures, this is done in the respective sections below). Have required resources been accounted for in the project budget? Are responsibilities and implementation	N/A	The project has been classified as a low risk project; any minor risk issue have been addressed appropriately by project activities. Hence, no need for an ESMP. Minor risks are described in chapter 4.4. Risk analysis and will be monitored throughout the project.

¹ The minimum requirements for consultation are summarized in table 6 in the ESMS Manual available at www.iucn.org/esms. The final ESIA report must contain a description of the public consultation process, including a summary of the concerns raised by various stakeholders and how these concerns have been addressed in the ESIA and ESMP.

² The minimum requirements for disclosure of information are summarized in table 5 in the ESMS Manual available at www.iucn.org/esms.

schedule specified?		
6. Has the guidance on ESMP monitoring ³ been followed and a plan to monitor the ESMP presented?	N/A	See above
7. Has a project-level complaint mechanism been developed based on IUCN's generic grievance mechanism?	Yes	This is very explicit in all of the approach and the management institutions to be established
8. Have relevant stakeholders been informed about the grievance mechanism or is it stated how this will be done upon launch of the project? ⁴	Yes	The project will establish a grievance mechanism and conflict resolution (articulated in form of activity A.1.16.) to assure that the rights of individuals are respected and any conflicts can be managed. Project management needs to ensure that the project-level mechanism will be fully compliant with the IUCN Grievance system ⁵ in terms of coverage of issues and its procedures (e.g. allowing not only for local submission of complaints but also, if pertinent, to the regional IUCN office or the Head of Oversight IUCN HQ).
Involuntary Resettlement and Access Restrictions		
9. Does the project require resettlement or access restrictions with the risk of causing adverse social impacts?	No	See explanation chapter 4.11
<i>Answer questions below only if standard has been triggered</i>		
10. Have project alternatives or adjustments of project design been sufficiently considered to avoid the need for resettlement or access restrictions?		
11. If avoidance of resettlement or access restrictions is not possible, have measures been developed to minimize the impact on people's livelihood and/or measures defined (assistance, benefits or compensation) to enhance or at least restore the livelihoods of affected people relative to pre-project levels ("no net loss") – documented in form of an Action Plan ⁶ ? Or, if time was not sufficient, has a process been established describing how these measures will be defined during project implementation and documented in form of a Process		

³ See ESMS Guidance Note on Developing and Monitoring an ESMP, available at www.iucn.org/esms.

⁴ See chapter 3.3.2 of the ESMS Manual about the need to inform stakeholders about the grievance system, available at www.iucn.org/esms

⁵ See Guidance Note on the IUCN ESMS Grievance Mechanism available at www.iucn.org/esms.

⁶ The plan is referred to as *Action Plan to Mitigate Impacts from Access Restrictions*; see respective Guidance Note for more information.

Framework?		
12. FPIC process: Have consultations been held with legitimate representatives of the affected groups? Have they participated in the development of the Process Framework or the Action Plan and assigned a role in its implementation and monitoring? Have they provided consent to project activities that trigger resettlement or restrictions? Is this documented?		
13. Are proposed mitigation measures technically and operationally feasible, sustainable and culturally adequate? Are they accessible by all affected groups? Are they sufficient?		
Indigenous Peoples		
14. Is the Standard triggered?	No	During the project preparation phase, and more explicitly visits to the three proposed project sites, it was confirmed that there are no indigenous people in the project area. In Mauritania only the Nemâdi, specialised Addax antelope hunters using dogs, would qualify. Probably numbering less than 200, they are confined to areas much further East and would only be affected if the project was somehow limiting access to their target animal (which is critically endangered) which is not the case. According to Catherine Taine-Cheikh even the Imraguen in the Banc d'Arguin would not qualify as indigenous peoples. Mauretania is a caste society with arab warriors and defeated berber people (les marabouts) dominating a number of free people (les "tributaires" – mostly from berber stock) who pay tax (or do labour) to them and then the whole underlayer of "liberated" slaves (Haratin) who were caught from sedentary southern peoples but have integrated into the Hassanya language and culture. It is not an ethnically diverse society with indigenous people. Vulnerability issues related to the Haratin are dealt with in question 42 and 43.
<i>Answer questions below only if standard has been triggered</i>		
15. Are negative impacts on indigenous people expected?		
16. Have project alternatives or adjustments of project design been sufficiently considered to avoid negative impacts?		
17. Have measures been developed to minimise the impacts, secure and, when appropriate, enhance the economic, social, environmental and cultural benefits to these communities and/or provide adequate and fair compensation for impacts?		

18. Consultation and FPIC process: Have consultations been held with legitimate representatives of the affected indigenous groups? Have they participated in the identification of impacts, the design of mitigation measures and/or in the development of an indigenous peoples plan (IPP)? Have they been assigned a role in its implementation and monitoring? Have they provided consent to project activities that might trigger impacts? Is this documented?		
19. Are proposed mitigation measures technically and operationally feasible, sustainable and culturally adequate? Are they sufficient and accessible by all affected groups?		
Cultural Heritage		
20. Is the Standard triggered?	Yes	There is a possibility of accidental finds of cultural resources in sites that had not been visited by the PPG team; however, this is overall considered not very likely. The project will monitor this risk (see A.4.1) and put in place a Chance Find Procedures to be communicated to all relevant staff and partners involved in excavations and earth movements. In light of these measures and given the low probability the significance of the risk has been rated as low - hence no further action is required.
<i>Answer questions below only if standard has been triggered</i>		
21. Have appropriate stakeholders been consulted in the assessment of impacts on cultural heritage (incl. users of the resources)?	n/a	
22. Have project alternatives been sufficiently considered to avoid impacts on cultural resources or the need to restrict access to resources?	n/a	
23. If avoidance is not possible, have measures been developed to minimise adverse impacts on cultural heritage and on the users of the resources? Have appropriate stakeholders been included in this process and assigned a role in its implementation and monitoring?	n/a	
24. Are proposed mitigation measures technically and	n/a	

operationally feasible, sustainable and culturally adequate?		
25. If the project involves earth works with a potential risk of accidental discovery of buried resources, does the project proposal contain provisions for “chance find”?	Yes	
26. If the project intends to promote the development or use of resources to which communities have legal (including customary) rights, has a FPIC process been implemented? Have arrangements been made to ensure fair and equitable sharing of the benefits?	n/a	
Biodiversity Conservation and Sustainable Use Living Natural Resources		
27. Is the Standard triggered?	No	The Standard is not triggered as impacts on biodiversity are expected to be exclusively positive. There is a low probability of minor impacts related to invasive species in restoration/reforestation activities. This is expected to be readily addressed as the project recommends against using any non-native species in afforestation activities (A.1.21).
<i>Answer questions below only if standard has been triggered</i>		
28. Will the project be able to avoid even minor, localized environmental impacts in protected areas and other areas of high biodiversity value?		
29. If the project requires the introduction of non-native species, will it be able to avoid adverse impacts including the potential of species developing invasive characteristics? Will the project be able to also control other pathways for invasive species, where such a risk exists?		
30. For projects managing or restoring ecosystems, have precautions been taken to avoid adverse impacts on other components of biodiversity?		
31. If risks of adverse impacts on water dynamics, river connectivity or the hydrological cycle been identified, will the project be able to avoid such impacts?		
32. Where the use of living natural resources is being promoted by the project, will it be ensured that the use is socially and		

environmentally sustainable?		
33. If the project requires the use of biocides (e.g. pesticide), has the Guidance Note for Pest Management Planning been followed? Have alternatives been sufficiently considered to avoid such use? If biocides cannot be avoided, will the project be able to prevent negative impacts on human health or biodiversity?		
Other environmental or social risks		
34. Is the project in compliance with national legislation and regulations that pertain to environmental and social matters and respective international laws, conventions and standards?	Yes	
35. If other social or environmental risks have been identified, have measures been developed to minimise the impacts or provide appropriate compensation? For impacts on vulnerable groups or on gender groups, please see section below.	Yes	The risk of not adopting alternative livelihood strategies; the risk will be managed as described the project document in chapter 4.4. Risk analysis As environmental risk has been identified the risk of improved management of wetland leading to increased migration. Also addressed by mitigation (see same chapter).
36. Are proposed mitigation measures technically and operationally feasible, sustainable and culturally adequate? Are they accessible by all affected groups and sufficient?	Yes	See the argumentation provided in chapter 4.4.
Gender		
37. Were men and women involved in project design and ESIA process in a culturally appropriate way?	Yes	See answer below.
38. If gender issues were identified during screening and/or ESIA, does the project proposal include measures to address these issues? Have these measures been developed in consultation with women in affected communities and gender experts with knowledge of local needs?	Yes	The project document is very gender sensitive and many of the activities specifically target women and women's groups. In some localities women's participation was low but in others predominant. The overall 30% attendance of women in community meetings is an achievement in the Mauritanian context and probably adequate (few disparities in general between localities).
39. Does the project include specific plans and measures to secure and, when appropriate, enhance the economic, social and environmental benefits to women?	Yes	Women are explicitly a target group for the activities (see above).

40. Does the project include specific measures to strengthen women's rights and access to land and resources, where applicable and consistent with national policy?	Yes	There is a specific national policy to institutionalise gender equity which is taken on board. This is quite challenging in the Mauritanian context but the project's approach to promote collective land rights for women's groups is likely to strengthen their access rights.
41. Does the monitoring plan provide for measuring gender equality progress and/or gender disaggregated indicators? If there is a risk that women may be affected by project activities, are specific provisions included to monitor these impacts and are services of qualified experts secured to guide this monitoring work?	Yes	Key indicators e.g. participation in exchange visits, in trainings, adoption of climate-resilient livelihoods are gender-disaggregated. This should be made explicit in the terms of reference of 4 the rural development technicians and supervised by the livestock and agricultural experts, but this has been standard practice for IUCN's work in Mauritania.
Vulnerable groups		
42. If risks for vulnerable groups were identified during screening and/or ESIA, were those addressed in the final project proposal?	Yes	The proponents have explicitly addressed the sensitive issue of the vulnerability of the haratin (former slaves) and of women (especially with regard to land rights). The analysis of the socio-economic context including traditional power relations (dominated by the nomadic livestock keepers) and of the opportunities (especially collective land ownership for women's groups) is adequate and through the approach (participatory with all societal strata involved) and the proposed monitoring of outcomes the risks seem to be well managed.
43. Does the project include specific plans and measures to reduce vulnerability, build resilience and promote equity?	Yes	Reducing vulnerability through the building up of resilient livelihoods is the main goal of the project and because of the nature of the target population (recently sedentarised haratin) and their predominant role in agricultural livelihoods the project will promote equity.
44. Does the monitoring plan include provisions to monitor these impacts?	Yes	Household incomes and their diversity (a major strategy for climate resilience) are indicators that will be monitored
Climate Change		
45. If it has been identified that climate change might affect the implementation of project activities or their effectiveness and sustainability, has this been addressed?	Yes	Climate predictions at sub-regional scale are challenging everywhere but in particular in the Sahel as it is the thin edge between two systems whose functioning is not well understood and therefore modelled. Data collection in the area has been scanty and inconsistent. Rainfall predictions for the Sahel vary between +30% and -30% so not very helpful. The proponent has analysed the situation well with the best available data and has prepared for a pessimistic scenario (temperature increase and decline in rainfall) which seems wise.

46. If there is a risk that the project might increase the vulnerability of communities and/or the ecosystem to current/ future climate variability and changes, have these issues been addressed?	N/a	The project's stated goal is to improve resilience to climate change in the 3 wetlands
47. Are opportunities sought to enhance the adaptive capacity of communities and/or ecosystem to climate change?	Yes	The project intends to increase the capacity and the flexibility of the communities in dealing with climate change through improved ecosystem management for sustainability, e.g. by diversifying livelihoods