



**Blue Horizon: Ocean Relief through Seaweed Aquaculture**  
**Executive Summary: Environmental and Social Management Framework, Process Framework, and Indigenous Peoples Planning Framework (Philippines)**

This document is a summary of the Environmental and Social Management Framework (ESMF), Process Framework (PF), and Indigenous Peoples Planning Framework (IPPF) that has been prepared for the Philippines portion of the WWF GEF project, 'Blue Horizon: Ocean Relief through Seaweed Aquaculture' (GEF ID: 10573). This executive summary, along with the executive summary of the project's Stakeholder Engagement Plan (SEP), is available in English and Filipino.

The full text of the ESMF and SEP is available in English on the websites of SEAFDEC, BFAR, and the WWF GEF Agency. Hard copies of the translated executive summaries of the ESMF and SEP will be placed in appropriate public locations and at SEAFDEC and BFAR.

## **1. INTRODUCTION**

The project 'Blue Horizon: Ocean Relief through Seaweed Aquaculture' will work at the global, regional, and national levels to strengthen and develop seaweed value chains. The project will be implemented in the coastal and marine ecosystems of Viet Nam and Philippines, where seaweed farming is growing as a lucrative business in coastal provinces as it provides livelihood resilience for communities, ecosystem services for biodiversity enhancement and generates revenues for emerging countries in order to alleviate poverty.

Centered on converting the intrinsic value of macroalgae into tangible benefits for society, the 'Blue Horizon: Ocean Relief through Seaweed Aquaculture' Project (hereinafter: Seaweed Project) seeks to *create new sustainable seaweed value chains that will deliver ecosystem services and socio-economic benefits*. The ecosystem services include the assimilation of excess nutrients from coastal waters, with associated environmental benefits that include mitigation of ocean eutrophication and acidification as well as improvement of habitat for marine life. Social and economic benefits include the diversification of livelihood options, improved household and community revenues and opportunities for equitable participation of women and men in the improved or new livelihood opportunities along the value chain.

The Seaweed Project was approved by the GEF Council on December 11, 2020. The project was endorsed by the GEF CEO on July 12, 2022. The project will be financed through a \$6,000,000 GEF grant and \$9,525,629 in co-financing.

WWF is the Implementing Agency for the project. Hence, the WWF's Environmental and Social Safeguards Framework (ESSF), as detailed in the Safeguards Integrated Policies and Procedures (SIPP), has been applied to the project and required the preparation of an Environmental and Social

Management Framework (ESMF), Process Framework (PF), and Indigenous Peoples Planning Framework (IPPF).

**The principles and procedures of the ESMF apply only to project activities that are funded through GEF.**

In general, the anticipated adverse environmental and social impacts on the population that resides within project affected areas are site-specific, reversible and can be readily mitigated. Thus, the Seaweed Project is classified as a “**Category B**” project under the WWF Environmental and Social Safeguards Categorization.

The institutional arrangement for the project includes WWF as the GEF Agency, the Southeast Asian Fisheries Development Center (SEAFDEC) as the Lead Regional Executing Agency (its Secretariat in Bangkok, Thailand will host the Project Management Unit), the Bureau of Fisheries and Aquatic Resources (BFAR) of the Philippines and Directorate of Fisheries (D-fish) of Viet Nam as the project executing partners, and a Project Steering Committee.

### **1.1. Objective of the Environmental and Social Management Framework (ESMF)**

The ESMF aims to outline the principles, procedures, and mitigation measures for addressing environmental and social impacts associated with the project in accordance with the laws and regulations of the Philippines and with the ESSF. Once the precise scope of pertinent activities is determined during the implementation phase, site-specific Environmental and Social Management Plans (ESMPs) will be developed pursuant to the guidance provided by this ESMF.

### **1.2. Objective of the Process Framework (PF)**

The Project triggers the WWF’s Standard on Access Restriction and Resettlement as it may restrict or otherwise affect access to natural resources and the livelihood activities of project affected people (PAP). This Process Framework (PF) describes the process by which affected communities participate in identification, design, implementation and monitoring of relevant project activities and mitigation measures. The purpose of this PF is to ensure participation of Project Affected People (PAP) while recognizing and protecting their rights and interests and ensuring that they do not become worse off as a result of the project.

As the project intends to enhance the livelihoods and resilience of indigenous peoples and local communities, the allocation of project benefits among local community members is particularly important. The intent of the framework is to ensure transparency and equity in the planning and implementation of activities by the project. This framework details the principles and processes for assisting communities to identify and manage any potential negative impacts of the project activities. Since the exact social impacts will only be identified during project implementation, the PF will ensure that mitigation of any negative impacts from project investments is done through a participatory process involving the affected stakeholders and rightsholders. It will also ensure that any desired changes by the communities in the ways in which indigenous peoples exercise customary tenure rights in the project sites would not be imposed, but should emerge from a consultative process.

### **1.3. Objective of the Indigenous Peoples Planning Framework (IPPF)**

Based on WWF’s Standard on Indigenous Peoples (IPs), the people affected by this project would thus be considered Indigenous, ethnic or tribal minorities. The objective of the Indigenous Peoples Planning Framework (IPPF) is to clarify the principles, procedures and organizational arrangements to be applied to IPs for the Seaweed project.

## 2. PROJECT DESCRIPTION

This section outlines the objectives of the Seaweed project, its components, milestones, and major supported activities. The specific project sites are also identified in Figure 1 of this section.

### 2.1. Project Objectives and Components

Environmental benefits are expected to result from the enhanced ecosystems services provided to the seaweed farms, specifically: mitigation of acidification of the sea, oxygenation of coastal waters, mitigation of eutrophication of marine waters, mitigation of harmful algal blooms and improvement in the conditions for aquatic biodiversity.

Economic benefits are expected to accrue from enhanced and diversified livelihood opportunities, which will improve incomes through the increased production of higher-quality biomass, production and sale of traditional product forms, participation in the production and sale of higher value products, and should it prove feasible, the prospect of additional income from carbon credits.

Social benefits are expected to include improved livelihoods, employment opportunities generated by the production of and trade in traditional and new consumer products, as well as enhanced food security.

The Project's objective will be achieved through the following four interconnected components:

**Component 1: Regional approach and capacity for seaweed value chains in SE Asia.** The project will develop a Regional Guide for Seaweed Aquaculture in the Region (among other plans, tools and trainings) to be adopted by the SEAFDEC Governing Council, synthesizing standards for seaweed aquaculture that are adapted to the region.

**Component 2: Enabling Environment for Seaweed Aquaculture in Philippines and Viet Nam.** A governance framework comprising policy, regulatory and technical guidelines will be developed to support seaweed expansion and to formulate and operationalize management plans.

**Component 3: Seaweed Value Chains (production + processing).** The project will work with organized producers to pilot farms in areas farther than current sites, which will serve as proof of concept for seaweed production offshore. The project will also establish new biorefinery and processing solutions closer to the site-level.

**Component 4: Knowledge Management, M&E, and IW Learn (regional).** The activities will be monitored and communicated through multiple channels. In this way, the project will utilize and expand on current baseline activities in the seaweed industry in the Philippines and Viet Nam to promote the interests of seaweed farmers and their communities, and grow the global market for seaweed in a sustainable and responsible fashion.

### 2.2. Project Area Profile

The project will be implemented in two sites in the Philippines and two sites in Viet Nam. Three of these are marine waters while the second site, in Viet Nam, comprises land-based coastal ponds that are being converted from shrimp to *Caulerpa lentillifera* culture (see location map in Figure 1).



**Figure 1. Project Sites: (1) Zamboanga City, Zamboanga Peninsula, Philippines; (2) Green Island, Roxas, Palawan, Philippines; (3) Thuận Nam District, Ninh Thuan province, Vietnam; (4) Ninh Hòa District, Khánh Hoà Province, Vietnam.**

### **3. ENVIRONMENT AND SOCIAL POLICY, REGULATIONS AND GUIDELINES**

This section first outlines the relevant laws and regulations of the Philippines and the WWF’s SIPP that are applicable to the project, and then discusses gaps between the Philippines’ laws and regulations and the SIPP. In cases where there are discrepancies between Philippine legislation and WWF’s SIPP, the SIPP shall prevail.

#### **3.1 Philippines’ Policies, Laws, Regulations Guidelines**

**The Fisheries Code of 1998** is the governing law in Philippine fisheries to address the interconnected issues of resource degradation and poverty among fishers and prescribes restrictions regarding access to fishery and aquatic resources to ensure the rational and sustainable development, management, and conservation of fishery and aquatic resources in Philippine waters. BFAR’s **Seaweed Roadmap** (2016-2022, with scheduled update for 2022-2027) provides strategies and interventions to introduce, expand and increase productivity of seaweed farming.

In addition to national-level plans, BFAR is currently updating the **Philippines National Standards (PNS)** on good aquaculture practices and raw dried seaweed, which covers practices that aim to prevent or minimize the risk associated with aquaculture production in any environment.

Also, the Philippine labor laws are compliant with international standards and the country has ratified a total of 38 ILO Conventions. The **PNS for Dried Raw Seaweed adopted in 2012** prescribes quality specifications and safety requirements of dried raw seaweed of the class Rhodophyceae (red seaweed) such as but not limited to Kappaphycus spp. and Eucheuma spp.

**The 1987 Constitution of the Republic of the Philippines** recognizes the rights of IPs to their ancestral domains and their power of dominion over their lands and resources. Moreover, it respects basic rights and their beliefs, customs and traditions tied to the land. Additionally, Article III, section 9 provides that private property cannot be taken for public use without just compensation.

Additionally, **the IPs Rights Act (IPRA) of 1997** recognizes and respects the rights of the various indigenous cultural communities in the Philippines, including rights of control of their ancestral lands and right to self-determination. The law created the National Commission for IPs (NCIP) which is tasked to implement the IPRA.

### **3.2 WWF Safeguards Standards and Procedures Applicable to the Project**

WWF's safeguards standards require that any potentially adverse environmental and social impacts are identified and avoided or mitigated. Safeguards policies that are relevant to this project are as follows.

#### **(i) Policy on Environment and Social Risk Management**

The Project is expected to support seaweed production and improve the livelihoods of seaweed farmers, and its environmental and social outcomes are thus expected to be positive. Adverse environmental and social impacts that may occur as a result of project activities are expected to be site-specific, negligible and easily mitigated.

The precise location and impact of specific activities cannot be determined at this stage and will only be known during project implementation. Site-specific ESMPs will be prepared as required, based on principles and guidelines of the ESMF.

#### **(ii) Policy on Protection of Natural Habitats**

The seaweed farming area, where project activities will be carried out, provides ecosystem services and livelihoods to project affected communities. Overall, the Seaweed Project activities will produce significant environmental and livelihood-related benefits. Any potential adverse environmental impacts on human populations or environmentally important areas including the local fisheries and aquaculture are expected to be very limited. However, the ESMF is prepared to properly manage the risk of any unforeseen adverse environmental impact on natural habitats, including critical natural habitats, as well as measures to enhance the project's positive environmental outcomes.

#### **(iii) Policy on Involuntary Resettlement**

The adverse resettlement impacts of the Seaweed project are expected to be minimal. Land acquisition or physical displacement will be avoided. Other forms of economic resettlement (e.g., restrictions of access to natural resources and livelihoods, loss of community property resources, land use conflicts, etc.) will be discouraged under the project. However, if such resettlement impacts will be unavoidable, mitigation measures will be taken to reduce and mitigate such impacts, in accordance with the guidance provided in the ESMF.

#### **(iv) Policy on Indigenous Peoples**

The WWF's policy requires ensuring that indigenous rights are respected, that IPs do not suffer adverse impacts from projects, and that IPs receive culturally appropriate benefits from conservation. The standard is triggered for the Seaweed Project in the Philippines as IPs reside in both project sites.

**(v) Standard on Community Health, Safety and Security**

This Standard ensures that the health, safety and security of communities are respected and appropriately protected. The Guidance on Labor and Working Conditions requires employers and supervisors to implement all reasonable precautions to protect the health and safety of workers through the introduction of preventive and protective measures. It also requires that the labor rights of project-employed workers are observed.

**(vi) Standard on Pest Management**

The project will not fund nor include the promotion or usage of pesticides. On the contrary, it will aim to reduce the amount of chemical fertilizers and pesticides used through strengthening of farmer capacity on the proper use of chemicals/non-chemical alternatives for seaweed farming.

**(vii) Standard on Cultural Resources**

Project activities are not expected to negatively impact cultural resources (which include archaeological, paleontological, historical, architectural and sacred sites as well as intangible cultural resources), since these will be implemented in areas that lack such resources (i.e., in coastal areas or inside the sea). However, to avoid any adverse impacts on cultural resources, the project will not finance activities that could significantly damage such resources. The Project Management Unit will also consult with local people and other relevant stakeholders in documenting the presence and significance of cultural resources, assessing the nature and extent of potential impacts on these resources, and designing and implementing mitigation plans.

**(viii) Policy on Accountability and Grievance System**

Project-affected communities and other interested stakeholders may raise a grievance at any time to the Project Team and WWF. The PMU will be responsible for informing project-affected parties about the Accountability and Grievance Mechanism. Contact information of the PMU and WWF will be made publicly available. Relevant details are also provided in the Grievance Redress section of this ESMF/PF.

The WWF Policy on Accountability and Grievance Mechanism is not intended to replace project- and country-level dispute resolution and redress mechanisms. 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.

**(ix) Standard on Public Consultation and Disclosure**

This standard requires meaningful consultation with relevant stakeholders, occurring as early as possible and throughout the project cycle. It requires the Project Team to provide relevant information in a timely manner and in a form and language that are understandable and accessible to diverse stakeholders. This standard also requires that information concerning environmental and social issues relevant to the project is disclosed for at least 30 days prior to implementation. WWF will disclose safeguards documentation on its Safeguards Resources web page. The final safeguards documents should be published on national websites of the Implementing Agencies and made available locally in specific locations. The project is also required to locally release all final key safeguards documents via hardcopy, translated into the local language and in a culturally appropriate manner, to facilitate awareness by relevant stakeholders that the information is in the public domain for review.

## (x) Standard on Stakeholder Engagement

This standard details the necessary requirements for meaningful, effective and informed stakeholder engagement in the design and implementation of projects. The project has prepared a Stakeholder Engagement Plan that will be implemented during the project.

### 3.3 Gaps between the Philippine's laws and policies and the WWF's SIPP

While the Philippine national regulatory systems are largely consistent and are complying with the WWF's SIPP, certain gaps exist between these two systems.

***Environmental protection and biodiversity.*** Though no relevant gaps in the country's laws exist, there are variances in terms of cumulative impact assessment on habitat and biodiversity, implementation of mitigation hierarchy, treatment of alien species, and biodiversity offsets.

***Resettlement.*** Analysis of the national systems indicate that the following gaps exist with respect to involuntary resettlement and access restrictions: (i) criteria for determining eligibility of informal settlers and cut off dates; (ii) adequacy of transition support, alternative income-earning opportunities, and livelihoods restoration, particularly for vulnerable people; (iii) protection for informal economic activities and compensation for loss; and (iv) full replacement cost for economic and physical displacement and (v) restrictions of access to natural resources in declared critical habitats resulting to economic and sociocultural displacement.

***Occupational health and safety.*** All the key elements of the WWF's Occupational Health and Safety Standards are adequately addressed by the current country legal framework, namely basic worker's rights (e.g., right to assembly, collective bargaining, overtime, minimum wage, insurance, separation benefits, etc.); non-discrimination; child labor; occupational health and safety; and grievance redress mechanism.

***Community health and safety.*** The country has an array of legislations dealing with public health and safety, including structural standards for buildings, fire safety, food safety and safety concerns on the use of pesticides. The country system, however, could provide explicit guidelines for anticipating and avoiding the transmission of sexually transmitted communicable diseases due to influx of temporary or permanent workers.

***Indigenous Peoples.*** Under the IP Rights Act of 1997 (IPRA), all proposed activities within ancestral domains/lands are subject to the Free, Prior, and Informed Consent (FPIC) as validated by the National Commission on Indigenous Peoples (NCIP), the identified **project sites are not located on ancestral domain lands and thus do not require FPIC under Philippine laws.** However, WWF's Standards do require FPIC for areas outside AD/L if project activities: may have significant impact on lands and natural resources subject to traditional ownership or under customary use; may cause relocation of IPs from those lands and natural resources; may have impacts on IP's cultural heritage material to their identities.

***Community engagement.*** Although a plethora of laws support stakeholder engagement through implementing agencies and local government units, resources and capacities are recognized constraints at implementation.

**For the purposes of the Seaweed project, the provisions of the WWF's SIPP shall prevail over Philippine legislation in all cases of discrepancy.**

#### 4. ANTICIPATED ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATION MEASURES

This section outlines potential adverse environmental and social impacts that may result from project activities. Table 1 outlines each potential environmental impact, proposed mitigation measures, and the party responsible for ensuring that potential impacts are avoided or mitigated. Table 2 does the same but for potential social impacts.

##### 4.1 Adverse Environmental Impacts and Mitigation Measures

As part of Component 3: Seaweed Value Chains, demonstration farms will be established within national marine spatial plan (MSP) frameworks in the following locations in the Philippines:

1. Zamboanga Peninsula, Philippines:
  - a. Magdaup, Ipil, Zamboanga Sibugay
  - b. Buenavista, Zamboanga CityThe farms will grow *Kappaphycus* spp. (offshore) and *Eucheuma denticulatum* (in circular marine fish cage modified for seaweed culture).
2. Green Island, Roxas, Palawan, Philippines: the farm will grow *Kappaphycus* spp. (offshore) and *Eucheuma denticulatum* (tubular net for consideration).

Without mitigation, these activities entail a series of potentially adverse environmental impacts, from the possibility of entanglement of sea turtles and damage of coral reefs to the introduction of construction related disturbances such as noise and dust. All the identified risks as well as the mitigation measures proposed to alleviate them are described in the table below (see Table 1).

Table 1. Anticipated Environmental Impacts and Mitigation Measures

Potential impact	Proposed mitigation measures	Responsible party
<b><i>Component 3: Establishment and operation of demonstration farms</i></b>		
<p><i>Weather risks:</i> adverse weather conditions (e.g., typhoons, monsoons), high waves, and changing sea temperature that may damage the seaweed growth.</p>	<p>The project will use cultivars that are tolerant to temperature fluctuations, especially higher water temperature.</p> <p>Timing of crops will be informed by local knowledge and long-term forecasts to avoid the months when typhoons or monsoons occur.</p> <p>The project will employ a culture system and use structures that provide protection to the crop from strong winds and rough seas.</p> <p>Sites will be located in areas that are reasonably sheltered from strong winds and currents.</p>	<p>Project technician for implementation</p> <p>Selected contractors for implementation</p> <p>Safeguards /Gender/M&amp;E Specialist for monitoring</p>
<p><i>Entanglement of sea turtles and dugongs:</i> the seaweed farming contributes to the improvement of the natural habitat and may attract sea turtles, dugongs and other endangered sea species to the farms' area, who may then be caught in the farmers' nets.</p>	<p>The field personnel will be instructed to regularly inspect the farm and free any dugong or sea turtle found entangled in the ropes.</p> <p>Awareness raising will be carried out among farmers to ensure that they are fully familiar with the relevant legislation and rules that protect marine life. This will include the dissemination of pictures of endangered species, visual materials that provide relevant information regarding the legal status of species, etc.</p> <p>Farms will be selected in locations where sea turtles are less likely to be present.</p>	<p>Project technician for implementation</p> <p>Selected contractors for implementation</p> <p>Safeguards/Gender/M&amp;E Specialist for monitoring</p>
<p><i>Chemical risks</i> such as pollution from agricultural and domestic runoffs, oil spills, unsuitable water parameters in growing area renders the area unsuitable for a seaweed demonstration farm.</p>	<p>The sites selected are in areas that are not exposed to heavy runoffs from land-based activities and with sufficient chemical and dissolved oxygen content.</p> <p>Offshore and deeper waters are generally safe from industrial, agricultural, and domestic discharges, and well oxygenated.</p> <p>Consultations have also confirmed the sites are designated solely for seaweed farming and will be outside the navigation routes for fishing and transport vessels</p>	<p>Project technician for implementation</p> <p>Selected contractors for implementation</p> <p>Safeguards/Gender/M&amp;E Specialist for monitoring</p>

<i>Pollution:</i> while seaweed farming in itself does not involve pollution, some of the tying materials are made of plastics, which may let loose and get into the sea.	It will be ensured as part of bidding documents that proper materials are used for the ropes and pollution is avoided Awareness raising will be carried out among farmers regarding the appropriate usage of ropes and how to avoid pollution	Project technician for implementation Selected contractors for implementation Safeguards/Gender/M&E Specialist for monitoring
<i>Biological risks</i> such as pests, grazers and predators, endo- and epiphytes, and diseases impact on the growth of the demonstration crops. Red tide is one of the major risks in this respect.	Sites are being selected that pose minimal risks from these factors; deeper offshore waters are generally less prone to epiphyte and endophyte infestation. Disease-resistant planting materials will be sourced and used for the demonstration crop (as mentioned above, providers of these quality materials have been engaged).	Project technician for implementation Selected contractors for implementation Safeguards/Gender/M&E Specialist for monitoring
<i>Damage to the local fauna:</i> an inappropriate placement of the farms may damage the local fauna, such as coral reefs.	The farms would not be placed on live corals A strict protocol will be developed and used on how farm sites will be selected Farm location will be carefully selected to avoid any damage to the local fauna	Project technician for implementation Selected contractors for implementation Safeguards/Gender/M&E Specialist for monitoring
<b>Component 3: Small-scale enterprises (construction works at the hatchery facility; the operation of the facility)</b>		
<i>Noise disturbance:</i> Possible noise disturbance as a result of outdoor equipment usage and transportation vehicles driving around the construction site	<i>Pre-construction:</i> requirements to limit noise pollution should be included in the bidding documents, as a precondition for the contractor's selection <i>During construction:</i> <ul style="list-style-type: none"> <li>Noise level control should be performed before the start up of construction activities;</li> <li>The equipment should be fitted with appropriate noise devices that will reduce sound level;</li> </ul>	Project technician for implementation Selected contractors for implementation Safeguards/Gender/M&E Specialist for monitoring

	<ul style="list-style-type: none"> <li>• The construction work should not be permitted during the nights, the operations on site shall be restricted to the hours 7am—7pm;</li> <li>• Vehicles that are excessively noisy shall not be operated until corrective measures have been taken;</li> </ul>	
<p><b>Air quality:</b> dust as a result of construction works and possible emissions from transportation vehicles</p>	<p><i>Pre-construction:</i> requirements to limit emissions should be included in the bidding documents, as a precondition for the contractor’s selection</p> <p><i>During construction:</i></p> <ul style="list-style-type: none"> <li>• Construction site, transportation routes and materials handling sites should be water-sprayed on dry and windy days;</li> <li>• Construction materials should be stored in appropriate and covered places to minimize dust;</li> <li>• Before allowing vehicles on site, fitness and emission test of the vehicle shall be performed;</li> <li>• Vehicle loads likely to emit dust need to be covered;</li> <li>• Workers should wear protective masks if dust appears;</li> <li>• Vehicle speed should be restricted within the construction site;</li> <li>• Regular maintenance of the vehicles and construction machinery should be performed in order to reduce any leakages of motor oils, emissions and dispersion of pollution;</li> <li>• Burning of debris from ground clearance shall be prohibited.</li> </ul>	<p>Project technician for implementation</p> <p>Selected contractors for implementation</p> <p>Safeguards/Gender/M&amp;E Specialist for monitoring</p>
<p><b>Waste:</b> generation of waste as a result of construction activities as well as during the operation of the facility</p>	<p><i>Pre-construction:</i> requirements for appropriate waste management should be included in the bidding documents, as a precondition for the contractor’s selection</p> <p><i>During construction:</i></p> <ul style="list-style-type: none"> <li>• Identification of the different waste types at the project site (soil, asphalt, food, etc.);</li> <li>• Ensure that camps are located away from existing stream, river, or</li> </ul>	<p>Project technician for implementation</p> <p>Selected contractors for implementation</p> <p>Safeguards/Gender/M&amp;E Specialist for monitoring</p>

	<p>water sources, and that no discharge from camps is made into nearby water bodies;</p> <ul style="list-style-type: none"> <li>• Proper containers/waste bins should be provided at the project site;</li> <li>• Dumping of waste on the sides of the road, on private land, or in other non-designated places should be prohibited;</li> <li>• Dumping waste shall be prohibited on fragile slopes, forests, religious or other culturally sensitive areas or areas where livelihood is derived;</li> <li>• Collection, transportation and final disposal of all waste should be undertaken regularly (weekly)</li> <li>• Possible hazardous waste (motor oils, vehicle fuels, etc.) should be collected separately and authorized collector and transporter should be sub-contracted to transport and finally dispose;</li> <li>• All construction materials should be covered during the transportation to avoid waste dispersion;</li> <li>• The options for reuse/recycling of the generated waste streams should be taking into consideration (e.g. excavated soil, etc.);</li> <li>• Burning of construction waste should be prohibited.</li> </ul> <p><i>After construction:</i></p> <ul style="list-style-type: none"> <li>• All waste shall be removed from the project site.</li> </ul> <p><i>During operation:</i></p> <ul style="list-style-type: none"> <li>• Trash bins should be installed in the facility</li> <li>• No waste should be thrown outside of the facility</li> <li>• Waste should be regularly collected (at least once a week)</li> </ul>	
<p><b>Water quality:</b> contamination of local water sources may occur due to wastewater and sewage from construction sites</p>	<p><i>Pre-construction:</i> requirements for appropriate measures to prevent water contamination should be included in the bidding documents, as a precondition for the contractor's selection.</p> <p><i>During construction:</i></p>	<p>Project technician for implementation</p> <p>Selected contractors for implementation</p> <p>Safeguards/Gender/M&amp;E</p>

	<ul style="list-style-type: none"> <li>• An environment-friendly toilet (e.g., pit toilet) and washing facilities should be made available, built with locally available materials</li> <li>• Open defecation in the vicinity of project sites should be prohibited</li> <li>• Throwing waste in water sources should be prohibited</li> <li>• Possible hazardous waste (motor oils, vehicle fuels, lubricants) should be collected separately and authorized entity should be transporting and disposing the hazardous waste;</li> </ul> <p><i>After construction:</i></p> <ul style="list-style-type: none"> <li>• Pit toilets are dismantled and pits are covered</li> <li>• All waste is removed from the project site</li> </ul>	Specialist for monitoring
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### **4.3 Adverse Social Impacts and Mitigation Measures**

While project activities aim to strengthen the sustainable livelihoods of local communities, it may also result in some adverse social impacts. For example, without mitigation measures, social tensions and land-use conflicts might arise from Component 2, as site-specific development maps may benefit some community members while also further marginalizing others. Similarly, the demonstration farms that Component 3 proposes may generate power asymmetries and conflicts with other fishermen, and expose local community members to various health hazards.

All the identified risks as well as the mitigation measures proposed to alleviate them are described in the table below (see Table 2).

Table 2. Anticipated Social Impacts and Mitigation Measures

Potential impact	Proposed mitigation measures	Responsible party
<p><b>1. Changes in the current access and usage rights of natural resources and livelihoods in project sites</b></p>	<p>The Process Framework (section 4.5) details the mitigation measures</p>	<p>Project technician for implementation Selected contractors for implementation Safeguards and Gender Specialist for monitoring</p>
<p><b>2. Social tensions resulting from site-specific development plans:</b> some community members may greatly benefit from site-specific development maps that would make them eligible to take part in project activities, while others may be left behind. Vulnerable community members may thus be further marginalized.</p>	<p>The development of site-specific plans will be carried out in a participatory manner, through community consultations that will be organized by professional facilitators. Special efforts will be undertaken to proactively engaged the most vulnerable community members. Those in the seaweed aquaculture sector, fisheries sector and other sectors will all need to be engaged.  Detailed community engagement activities are provided in the Stakeholders Engagement Plan.</p>	<p>Project technician for implementation Selected contractors for implementation Safeguards/Gender/M&amp;E Specialist for monitoring</p>
<p><b>3. Selection criteria for participation in cooperatives:</b> only cooperative members can directly benefit from project activities. While membership will be open to all community members, the requirement to pay membership fees may exclude vulnerable households and the number of participating households is likely to be limited, restricting the number of beneficiaries.</p>	<p>Cooperative membership and management will be guided by the Philippine Cooperative Code of 2008 (RA9520). Vulnerable community members (female-headed households, disabled persons, widows/widowers, elderly, youth) will be prioritized for cooperative membership.  Cooperative members that are unable to pay due to the economic conditions of their households will be supported by the project.</p>	<p>Project technician for implementation Selected contractors for implementation Safeguards/Gender/M&amp;E Specialist for monitoring</p>
<p><b>4. Power asymmetries:</b> Project</p>	<p>With organized groups that are managed professionally, the probability of</p>	<p>Project technician for</p>

<p>activities may result in power asymmetry in the community by which the members with more power tend to appropriate the major roles in and benefits from the project, while excluding more vulnerable community members.</p>	<p>this risk arising would be low. The project will engage and provide opportunities for meaningful participation of all community members.</p>	<p>implementation Selected contractors for implementation Safeguards/Gender/M&amp;E Specialist for monitoring</p>
<p><b>5. Conflicts with other fishermen and local community:</b> the demonstration farm may be disturbed by other fishermen's boats, and crops may be stolen by local community members.</p>	<p>The Project has consulted with the Local Governments and the local communities, to obtain information and assurance – backed by local regulation -- that the site of the project does not obstruct navigation and does not prevent fishers from accessing fishing grounds. Regular patrols by farmers will be carried out to ensure the safety and security of the demonstration farm. Detailed guidelines for patrol operations will have to be developed in collaboration with the farmers and local communities. An area management plan that comprises good management practices and safety standards for the identified seaweed farm site will be developed to avoid negative impacts of the farm operation on the environment and thus to other users of the same marine landscape. Project authorities will closely monitor activities to ensure that causes for conflicts are minimized.</p>	<p>Project technician for implementation Selected contractors for implementation Safeguards/Gender/M&amp;E Specialist for monitoring</p>
<p><b>5. Exclusion of women:</b> project activities may result in the potential marginalization of women, at least in the care and harvesting of the crop, because they would have more difficulty in accessing the offshore, deeper seaweed sites (which also pose greater risks) than they have now to the nearshore, shallow and at most chest deep growing areas.</p>	<p>Measures to support women's engagement are provide in the Gender Action Plan, attached to the Project Document.</p>	<p>Project technician for implementation Selected contractors for implementation Safeguards/Gender/M&amp;E Specialist for monitoring</p>

<p><b>6. Child labor:</b> it is culturally habitual that children help their parents with farming activities on shore.</p>	<p>The project team will carry out awareness raising among local farmers to explain the risks of child labor, and ensure that children are not engaged in any project-related works.</p>	<p>Project technician for implementation Selected contractors for implementation Safeguards/Gender/M&amp;E Specialist for monitoring</p>
<p><b>7. Collectors' job loss</b> as a result of supply chain changes: The function of collectors would become obsolete as a result of project activities, as farmers would be directly connected to processing facilities, thus resulting in job loss for some of the local residents.</p>	<p>The project team will aim to integrate seaweed collectors into project activities and assist them to assume new functions as part of the seaweed supply chain (e.g., as part of the cooperatives, processing facilities, etc.).</p>	<p>Project technician for implementation Selected contractors for implementation Safeguards/Gender/M&amp;E Specialist for monitoring</p>
<p><b>8. Cultural challenges:</b> Culturally inappropriate project delivery may hamper relationships with and social acceptability by the community of the project.</p>	<p>The project team will work with local community facilitators, opinion leaders and organized farmer and women groups, the project 1) will ensure appropriate community protocols are followed, does not debase local culture and traditions; and (2) be sensitive to local issues that have the potential to turn into problems, and plan and carry out ways to resolve them before they escalate into a social conflict.</p>	<p>Project technician for implementation Selected contractors for implementation Safeguards/Gender/M&amp;E Specialist for monitoring</p>
<p><b>9. Workers' health and safety</b> as a result of occupational hazards during the establishment of the demonstration farms, the construction works at the hatchery facility, as well as the operation of the facility.</p>	<p>Project technicians and the implementing contractors shall provide a safe and healthy work environment, taking into account physical, chemical or biological risks that may be inherent in project activities—especially off-shore. They shall also take steps to prevent accidents, injury, and disease arising from, associated with, or occurring in the course of work by minimizing, as far as reasonably practicable, the causes of hazards. In a manner consistent with good international industry practice, the implementing contractor shall (i) identify potential hazards to workers, particularly those that may be life-threatening; (ii) provide preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances; (iii) train workers as</p>	<p>Project technician for implementation Selected contractors for implementation Safeguards/Gender/M&amp;E Specialist for monitoring</p>

	<p>necessary; (iv) document and report occupational accidents, diseases, and incidents; and (v) undertake emergency prevention, preparedness, and response arrangements.</p> <ul style="list-style-type: none"> <li>• Ensure regular health screening for the workers pre and during construction activities</li> <li>• Ensure that no underage workers, or children are engaged</li> <li>• Ensure decent work conditions, including an appropriate salary, working hours, accommodation and food for workers shall be provided to all workers</li> <li>• Ensure that workers are employed on the principle of equal opportunity and fair treatment, and there is no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, and disciplinary practices</li> <li>• Implement a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns</li> </ul> <p>With regards to COVID-19, advisories on precautionary, exigency, and emergency measures by WHO and the government health authority will be heeded and complied with. These will be brought to the attention of all project personnel and anyone doing personal transaction with any project staff for the purpose of having a common understanding and as much as possible mutual agreement of the need for and benefits of compliance.</p>	
<p><b>10. Local community's health and safety</b> as a result of occupational hazards during the establishment of the demonstration farms and the construction works at the hatchery facility.</p>	<p>Project and the implementing contractors shall evaluate the risks and impacts to the health and safety of the affected community during the implementation of project activities, and shall establish preventive measures to address them in a manner commensurate with the identified risks and impacts.</p> <p>Project activities shall prevent adverse impact on the quality and supply</p>	<p>Project technician for implementation</p> <p>Selected contractors for implementation</p> <p>Safeguards/Gender/M&amp;E</p>

	<p>of water to local communities, ensure the safety of construction infrastructure and equipment, introduce protective mechanisms for the use of hazardous materials; and undertake all necessary emergency preparedness and response measures.</p> <p>Specific measures include the following:</p> <ul style="list-style-type: none"> <li>• Ensure the safety of all project-related equipment, in line with the requirements above;</li> <li>• Minimize the use of hazardous materials, and ensure that community members are not exposed to them. In case that the use of such materials is necessary, provide sufficient notice to local community members and inform them on safety and protection measures;</li> <li>• Avoid dumping any waste or otherwise contaminating community sources of water supply and water quality;</li> <li>• Provide information to local communities on construction activities and plans.</li> </ul> <p>With regards to COVID-19, advisories on precautionary, exigency, and emergency measures by WHO and the government health authority will be heeded and complied with. These will be brought to the attention of all project personnel and anyone doing personal transaction with any project staff for the purpose of having a common understanding and as much as possible mutual agreement of the need for and benefits of compliance.</p>	Specialist for monitoring
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## 4.5 Process Framework: Livelihood Restoration Measures

The development of site-specific management plans as part of the project may result in restrictions of access to livelihoods and natural resources for local communities. This may include local fishermen who may lose access to fishing areas; local SMEs that are engaged in tourism, aquatic animal culture, fishing, navigation, energy production, or other forms of business; or any other stakeholders whose livelihoods may be affected as a result of project activities.

Any change of land use, sea use or new zonation should be based on free and prior informed consultations of the affected communities and relevant authorities, which should be carried out prior to finalizing any usage changes.

If the planned spatial seaweed zonation negatively impacts sources of economic income or other types of livelihoods of affected communities, full and timely compensation shall be provided to all affected individuals, irrespective of their formal land title. All affected communities and households around the project-supported areas will be provided with opportunities to restore their livelihoods to at least pre-project levels.

Livelihoods-related support during project implementation will be provided to the households (HH) of all communities impacted by project-induced restrictions of access to natural and community resources within the targeted areas. This process will be organized in the following manner:

- *Screening*

The Safeguards/Gender/M&E Specialist at BFAR, with technical inputs from the Project Technicians, will undertake a screening of all planned activities for likely access restrictions to local communities. This will include both communities that reside in project-affected areas, and individuals that may lack title.

- *Social assessment*

If the screening confirms and identifies HHs affected due to access restriction to natural resources, a social assessment (SA) process based on participatory consultations with affected peoples will be carried out. The SA will assess potential impacts and the extent of restriction of access to resources along with suitable mitigation and enhancement measures including options for alternative access to similar resources.

- *Livelihood Restoration Plans*

Based on the findings of the screening and social assessment, if livelihoods will be negatively affected by project activities, an action plan that is known as a Livelihood Restoration Plan (LRP) will be prepared after holding further meaningful consultations with affected peoples and stakeholders which will provide tailored livelihood support and benefit sharing for affected persons, groups and communities.

- *Mitigation measures as part of the LRPs*

Participatory and inclusive consultations should be carried out with affected communities, individuals, and stakeholders to agree on the allocation of alternative livelihoods. Eligibility criteria should be established according to guidelines provided in Section 5.7 Community Engagement of the ESMF/PF.

Alternative livelihood schemes should be discussed, agreed upon and provided for affected persons/ groups. The livelihood options to be built on and be based upon the traditional skills, knowledge, practices and the culture/world view of the affected peoples/groups and persons.

Affected persons should be provided project-related livelihood support and other opportunities as part of the planned project activities. These may include activities implemented as part of the following outcomes:

- Outcome 3.1: Improved technologies and testing for seaweed value chains
- Outcome 3.2: Generating benefits from seaweed aquaculture for target communities

An accessible and efficient grievance redress mechanism should be established and made functional (see Section 5.9 of this ESMF/PF).

Any proposed measures should be closely coordinated with project affected peoples to ensure that they fully reflect their needs and priorities.

- *Compensation*

In case that compensation is awarded, it shall be calculated based on the replacement value of these livelihoods (economic market value plus any replacement costs) by the Safeguards/Gender/M&E Specialist at BFAR. In cases where compensation will consist of the allocation of alternative resources (e.g., alternative fishing areas), measures will include identification of these resources with the active involvement of the affected persons/communities and assistance to access these resources. Detailed procedures on how compensation should be calculated and awarded should be provided in each site-specific LRP based on local conditions.

## **5. IMPLEMENTATION ARRANGEMENTS**

This section of the full ESMF lists prohibited project activities and details the institutional arrangements, roles and responsibilities of stakeholders and other involved parties. Community engagement and the inclusion of indigenous and vulnerable people are important parts of this section, which makes clear the responsibilities for project implementation while ensuring that all groups, especially project affected peoples and vulnerable groups, are represented.

### **5.1. Procedures for the Identification and Management of Environmental and Social Impacts**

The Safeguards/Gender/M&E Specialist at BFAR should fill in detailed information regarding the nature of each project activity into the activity-level ESS Screening and, if the activity falls into one of the excluded categories, it will be deemed ineligible for funding under the Project. The executing partners will thus be required to change the nature or location of the proposed activity so that it complies with all safeguards requirements.

The executing partners shall respond to the specific questions in Part 3 of the form, provide general conclusions regarding the main environmental and social impacts of each proposed activity, outline the required permits or clearances, and specify whether any additional assessments or safeguard documents (e.g., ESMP) should be prepared. If the screening process indicates that additional assessments or safeguards documents shall be prepared, these should be carried out by the executing partners prior to the start of activities.

If the screening reveals adverse environmental or social impacts that may arise from the planned activity, an ESMP should be prepared. The ESMP should be prepared by the Safeguards/Gender/M&E Specialist at BFAR, in collaboration with the Project Technicians.

### **5.2. Guidelines for ESMP Development**

In case that the Environmental and Social screening process identifies any adverse environmental or social impacts as a result of specific project activities, the Safeguards/Gender/M&E Specialist in collaboration with the Project Technicians should

develop a site- and activity-specific ESMP before those project activities begin. The ESMP should describe adverse environmental and social impacts that are expected to occur as a result of the specific project activity, outline concrete measures that should be undertaken to avoid or mitigate these impacts, and specify the implementation arrangements for administering these measures.

### **5.3. Stakeholders' Role & Responsibilities in the ESMF Implementation**

#### **(a) General**

The institutional arrangement for project implementation includes WWF as the GEF Agency, the Southeast Asian Fisheries Development Center (SEAFDEC) as the Lead Regional Executing Agency (its Secretariat in Bangkok, Thailand will host the Project Management Unit), the Bureau of Fisheries and Aquatic Resources (BFAR) of the Philippines and Directorate of Fisheries (D-fish) of Viet Nam as the project executing partners in the Philippines and Viet Nam, respectively, and a Project Steering Committee.

#### **(b) Safeguards Implementation**

Specific arrangements and an overview of responsibilities related to the implementation of environmental and social safeguards requirements, as stated in this ESMF/PF are as follows:

##### **Lead executing agency (SEAFDEC):**

- Overall responsibility for ensuring that environmental safeguards are implemented.

##### **Project Steering Committee:**

- Overall oversight and monitoring of compliance with safeguards commitments.
- Support and specific recommendations on specific safeguard issues if needed.

##### **WWF GEF Agency:**

- Overall oversight and monitoring of compliance with safeguards commitments.
- Support and specific recommendations on specific safeguard issues if needed.

##### **BFAR PMU:**

- Ensuring that bidding documents and contracts include any relevant particular clauses or conditions relevant to environmental and social safeguards as set out in this ESMF. It is particularly important to include in bidding documents requirements related to occupational health and safety.
- Implementing and supervising ESMF and other safeguard plans;
- Overall responsibility for the operation of the grievance redress mechanism for activities in Philippines.

##### **Safeguards & Gender Specialist at the BFAR PMU:**

- Overall responsibility for compliance with ESMF Safeguards and other annexed documents of this report;
- Screening all project activities to identify social and environmental impacts;
- Contributing to the preparation of site-specific ESMPs as needed;
- Conducting consultation meetings with local stakeholders as required, informing them, updating them on the latest project development activities;
- Reporting on safeguards implementation and compliance to the PMU Project Manager and to SEAFDEC;
- Ensuring that consultations with local communities are carried out in an inclusive and participatory manner, and are well documented;

- Monitoring the state of safeguards implementation, and ensure that sub-projects are implemented in accordance to best practices and guidelines set out in the ESMF;
- Identifying and liaising with all the stakeholders involved in environmental and social related issues in the Project;
- Operate the project's Grievance Redress Mechanism (GRM), including compiling and reporting on project-related grievances, monitoring grievance resolution, and closing the feedback loop with the complainant.
- Carrying out field visits as necessary to monitor the implementation of project activities and their compliance with safeguard requirements;

## 5.4. Indigenous People Planning Framework (IPPF)

### (a) IP Population of Project Sites

**Palawan.** Identified as one of the indigenous groups in Palawan, the Cuyunon is the largest ethnic group residing in Green Island and those who are also involved in seaweed farming. Unlike other ethnic groups, they have long intermingled with residents from other municipalities in Palawan and are now well-integrated in communities and the whole province,

**Zamboanga.** The Zamboanga Peninsula consists of several ethnic and religious groups. These include 5 Muslim tribes (Iyakan, Kalibugan, Tausog, Bangingi and Sama Badjao), 1 Christian group (Subanen) and several ethnic groups (Siama (Bangingi + Sama Badjao)), Kalibugan, and Subanen) that are considered IPs. Another ethnic group that resides in the area is Bisaya, long-term residents who are well-integrated into the community. There are no conflicts between tribes and IPs and migrants.

### (b) Project Impacts on IP Groups

The presence of IPs in the project sites requires a social assessment to generate the necessary baseline information on demographics, social, cultural, and political characteristics of affected IP communities as well as the land and territories that they have traditionally owned or customarily used or occupied, and the natural resources on which they depend. A social assessment process was carried out as part of the preparation of safeguard documentation, drawing on desk review and field visits and consultations.

As IP groups constitute the main population group in the project area, they will both take advantage of the project's positive effects and its potentially adverse impacts. Based on stakeholder consultations, no group among the IP population seems to be disadvantaged vis-à-vis other IP groups.

The introduction of value-adding technologies, along with strengthening the seaweed value chains activities supported by the project, will have positive long-term impacts on the livelihoods of local IP communities and sustainable management of natural resources. In fact, IP communities will be able to take advantage of all project activities and opportunities.

There are expected to be no distinct adverse impacts as a result of project activities on one IP group or the other. The potential negative impacts and associated mitigation measures that are listed in Section 4 may thus apply to all IP groups in either Palawan or Zamboanga. The full ESMF details specific measures for IPs in regard to the project.

### (c) Developing an Indigenous Peoples Plan (IPP)

WWF's Standard on Indigenous People requires:

- A careful preparation of an IPP with the participation of affected communities, regardless of whether project affected IPs are affected adversely or positively.
- A screening for IPs to assess risks and opportunities, and to improve the understanding of the local context and affected communities.

Based on the results of the social assessments, an IP Plan shall be developed for each project site. The contents of the IPP will depend on the specific project activities identified and the impacts these activities may have on IPs in the project area.

#### 5.4. Monitoring

The overall responsibility for implementing the ESMF and for monitoring compliance with the Project's environmental and social safeguard activities lies with the BFAR PMU. The Safeguards/Gender/M&E Specialist at BFAR shall oversee the implementation of all field activities and ensure their compliance with the ESMF. The Safeguards/Gender/M&E Specialist shall also monitor the project's grievance redress mechanism (GRM) and assess its effectiveness (i.e., to what extent grievances are resolved in an expeditious and satisfactory manner). The Safeguards and Gender Specialist at BFAR will provide the Project Manager at SEAFDEC with monthly monitoring reports. ***Disbursement of project funds will be contingent upon their full compliance with the safeguards requirements.***

WWF as the project's implementing agency and SEAFDEC as the executing agency are responsible to oversee compliance with the ESMF.

#### 5.6. Community Engagement

Project affected people should be engaged **in advance of the implementation of each activity that may affect their interests, entitlements, and livelihoods**. Community members that should be engaged in consultations are those persons who, as a direct consequence of an activity would, without their informed consent or power of choice, either: (a) lose their assets or access to assets or access to community and natural resources, or (b) lose a source of income or means of livelihood, whether or not they physically relocate to another place. Vulnerable and marginalized groups (women, youth, disabled individuals, elderly) should be actively engaged in project-related consultations and in the development of LRPs.

Once the community engagement process has started, it must be maintained. Stakeholders in the community must be kept informed, and support has to be provided when needed, conflicts have to be resolved, methods have to be devised to keep the process reasonably efficient, goals and deadlines have to be set.

The project's Stakeholder Engagement Plan (SEP) provides detailed guidelines on the engagement of various stakeholders and outlines a range of specific stakeholder organizations and actors that should be engaged. Full details regarding workshops, stakeholder meetings, field-level consultations (including meetings with a range of local stakeholders, community groups, site visits, field inspections, and focus group discussions), presentations and interactions are provided in the SEP, of which a summary has also been translated for disclosure to stakeholders.

#### 5.6. Communications and Disclosure

These executive summaries of the ESMF and associated SEP have been translated into Filipino and made available along with the full text of the ESMF and SEP in English on the websites of SEAFDEC and BFAR, as well as the websites of the WWF GEF Agency. Hard copies of the translated executive summaries of the ESMF and SEP will be placed in appropriate public locations and at SEAFDEC and BFAR.

During the implementation of the project, activity-specific ESMPs shall be prepared in consultation with affected communities and disclosed to all stakeholders prior to project concept finalization.

Disclosure should be carried out in a manner that is meaningful and understandable to the affected people. For this purpose, the executive summary of ESMPs or the terms and conditions in environment clearances should be disclosed on SEAFDEC, BFAR and WWF websites.

### 5.7. Capacity Building and technical assistance

Capacity building activities will be provided as needed by WWF US to SEAFDEC and BFAR to assist the latter with ESMF/PF/IPPF implementation requirements and good practices. The budget for capacity building shall be included in Component 4.

### 5.8 Grievance Mechanisms

The project will have a direct and tangible effect on local communities and individuals residing within or in the vicinity of project sites. There is thus a need for an efficient and effective Grievance Redress Mechanism (GRM) that collects and responds to stakeholders' inquiries, suggestions, concerns, and complaints. The GRM shall constitute an integral part of the project and assist BFAR in identifying and addressing the needs of local communities. The GRM should be constituted as a permanent and accessible institutional arrangement for addressing any grievances arising from the implementation of project activities.

It is in the interest of the project to ensure that all grievances or conflicts that are related to project activities are appropriately resolved at the lowest appropriate level, without escalation to higher authorities or the initiation of court procedures. Project affected communities will therefore be encouraged to approach the project's GRM if they feel it is the appropriate level to safely address their grievance.

The GRM will operate based on the following principles:

1. **Fairness:** Grievances are assessed impartially and handled transparently.
2. **Objectiveness and independence:** The GRM operates independently of all interested parties in order to guarantee fair, objective, and impartial treatment to each case.
3. **Simplicity and accessibility:** Procedures to file grievances and seek action are simple enough that project beneficiaries can easily understand them and in a language that is accessible to everyone within a given community, especially those who are most vulnerable.
4. **Responsiveness and efficiency:** The GRM is designed to be responsive to the needs of all complainants. Accordingly, officials handling grievances must be trained to take effective action upon, and respond quickly to, grievances and suggestions.
5. **Speed and proportionality:** All grievances, simple or complex, are addressed and resolved as quickly as possible. The action taken on the grievance or suggestion is swift, decisive, and constructive.
6. **Participation and inclusiveness:** A wide range of affected people—communities and vulnerable groups—are encouraged to bring grievances and comments to the attention of the project implementers. Special attention is given to ensure that poor people and marginalized groups, including those with special needs, are able to access the GRM.
7. **Accountability and closing the feedback loop:** All grievances are recorded and monitored, and no grievance remains unresolved. Complainants are always notified and get explanations regarding the results of their complaint. An appeal option shall always be available.

Complaints may include, but not be limited to, the following issues:

- (i) Allegations of fraud, malpractices or corruption by staff or other stakeholders as part of any project or activity financed or implemented by the project;
- (ii) Environmental and/or social damages/harms caused by projects financed or implemented (including those in progress) by the project;
- (iii) Complaints and grievances by permanent or temporary workers engaged in project activities.

Complaints could relate to pollution prevention and resource efficiency; negative impacts on public health, environment or culture; destruction of natural habitats; disproportionate impact on marginalized and vulnerable groups; discrimination or harassment; violation of applicable laws and regulations; destruction of physical and cultural heritage; or any other issues which adversely impact communities or individuals in project areas. The grievance redress mechanism will be implemented in a culturally sensitive manner and facilitate access to vulnerable populations.

The GRM will be administered by the BFAR PMU and reported to the SEAFDEC PMU. The project's GRM will operate in close coordination with the existing GRM at BFAR, which is managed by the Department of Legislation & Inspection.

The Safeguards/Gender/M&E Specialist at BFAR will collaborate with the Department of Legislation & Inspection, so that all inquiries or complaints related to the project will be properly and timely collected and processed. The GRM will operate according to the following guidelines.

**(1) Submitting complaints:** Project affected people, workers, or interested stakeholders can submit grievances, complaints, questions, or suggestions to the BFAR PMU through a variety of communication channels, including phone, regular mail, email, text messaging/SMS, or in-person, by visiting the BFAR offices. It should be possible to submit complaints to both WWF and BFAR in order to ensure that project affected people have sufficient opportunities to lodge their complaints to impartial and neutral authorities of their choice.

**(2) Processing complaints:** All grievances submitted to BFAR shall be registered and considered. A tracking registration number should be provided to all complainants. To facilitate investigation, complaints will be categorized into four types: (a) comments, suggestions, or queries; (b) complaints relating to nonperformance of project obligations and safeguards-related complaints; (c) complaints referring to violations of law and/or corruption while implementing project activities; (d) complaints against authorities, officials or community members involved in project management; and (e) any complaints/issues not falling in the above categories. Complaints submitted to BFAR will be handled by the Department of Legislation & Inspection in line with its operational procedures in coordination with the Safeguards/Gender/M&E Specialist.

**(3) Acknowledging the receipt of complaints:** Once a grievance is submitted, the Safeguards/Gender/M&E Specialist at BFAR shall acknowledge its receipt, brief the complainant on the grievance resolution process, provide the contact details of the person in charge of handling the grievance, and provide a registration number that would enable the complainant to track the status of the complaint.

**(4) Investigating complaints:**

- a. For complaints submitted to BFAR, the Department of Legislation & Inspection will assign the complaint for the investigation of relevant authorities, while notifying the project's Safeguards/Gender/M&E Specialist.

A written response to all grievances shall be provided to the complainant within 10 working days, in line with the operational procedures of the Department of

Legislation & Inspection. Grievances that cannot be resolved by grievance receiving authorities/office at their level should be referred to a higher level for verification and further investigation.

**(5) Appeal:** In the event that the parties are unsatisfied with the response provided by the GRM, the following appeal process is suggested: Appeals on complaints that were first lodged to BFAR can be submitted to WWF. In both cases, appeals should be submitted within 10 days from the date of the original decision. In the event that the parties are unsatisfied with the appeal decision, the parties can submit their grievances to the Court of Law for further adjudication.

**(6) Monitoring and evaluation:** the Safeguards/Gender/M&E Specialist at BFAR shall submit a report with full information on the grievances that were submitted to BFAR to SEAFDEC. The report shall contain a description of the grievances and their investigation status. Summarized GRM reports shall constitute part of the regular project progress reporting, and shall be submitted by SEAFDEC to the PSC and WWF GEF Agency.

Information about channels available for grievance redress shall be widely communicated in all project affected communities and to all relevant stakeholders. The contact details (name, phone number, mail and email address, etc.) of BFAR and WWF GRMs shall be disseminated as part of all public hearings and consultations, in the local media, in all public areas in affected communities, and on large billboards in the vicinity of project activity sites.

The GRM seeks complement, rather than substitute, the judicial system and other dispute resolution mechanisms. All complainants may therefore file their grievance in local courts or approach mediators or arbitrators, in accordance with the legislation of The Philippines.

In addition to the project-specific GRM, a complainant can submit a grievance to the WWF GEF Agency. A grievance can be filed with the Project Complaints Officer (PCO), a WWF staff member fully independent from the Project Team, who is responsible for the WWF Accountability and Grievance Mechanism and who can be reached at:

Email: [SafeguardsComplaint@wwfus.org](mailto:SafeguardsComplaint@wwfus.org)

Mailing address:

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

Stakeholders may also submit a complaint online through an independent third-party platform at <https://report.whistleb.com/vi/wwf>.

Alternatively, complaints may be submitted to the GEF's Conflict Resolution Commissioner, which can be reached at:

Mr. Peter Lallas, GEF Conflict Resolution Commissioner

E-mail: [plallas@thegef.org](mailto:plallas@thegef.org)

Mailing address: Mr. Peter Lallas  
Global Environment Facility  
The World Bank Group, MSN N8-800  
1818 H Street, NW  
Washington, DC 20433-002

## **5.9. Budget**

The EMSF implementation costs, including all costs related to compensation to project affected people, will be fully covered from the project budget. It will be the responsibility of the Safeguards and Gender Specialist at BFAR to ensure that sufficient budget is available for all activity-specific mitigation measures that may be required in compliance with the EMSF.

A full-time Safeguards and Gender Specialist will be employed by BFAR and 100% of their time will be dedicated to ensuring the ESMF implementation. A permanent M&E Officer will be employed by SEAFDEC and will monitor the ESMF implementation.