

Appraisal Environmental and Social Review Summary Appraisal Stage (ESRS Appraisal Stage)

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CRITICAL ECOSYSTEM PARTNERSHIP FUND - CARIBBEAN HOTSPOT PROJECT (P173464)

BASIC INFORMATION

A. Basic Project Data

| Country | Region | Project ID | Parent Project ID (if any) |
|---------------------------------------------------------|-------------------------------------------------------------------|--------------------------|----------------------------|
| Caribbean | LATIN AMERICA AND CARIBBEAN | P173464 | |
| Project Name | CRITICAL ECOSYSTEM PARTNERSHIP FUND – CARIBBEAN HOTSPOT PROJECT | | |
| Practice Area (Lead) | Financing Instrument | Estimated Appraisal Date | Estimated Board Date |
| Environment, Natural Resources & the Blue Economy | Investment Project Financing | 1/27/2021 | 5/28/2021 |
| Borrower(s) | Implementing Agency(ies) | | |
| Conservation International | Conservation International Foundation, Conservation International | | |

Proposed Development Objective

The project development objective (PDO) is to improve the capacity of civil society organizations to reduce threats to globally important biodiversity in the Caribbean Islands Biodiversity Hotspot.

Financing (in USD Million)

Amount

Total Project Cost 13.90

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The project addresses the issue that globally important biodiversity of the Caribbean Islands Hotspot is threatened by over exploitation, habitat loss, and invasive alien species and that CSO capacity will need to be built to help achieve this. To achieve this, it seeks to overcome two key constraints: first that CSOs' capacity to implement conservation actions is constrained by administrative, financial and technical limitations; and second that CSOs' ability to deliver conservation impact at scale is hindered by isolation, lack of coordination and weak dissemination of good practice. To

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this end, the project will have five components, with Components 1-4 reflecting the short-term outcomes in the Theory of Change and Component 5 providing the administrative, management and monitoring and evaluation functions necessary for the effective implementation of the other components. The five components are:

- a) Component 1: Increased Share of Land and Sea in and around Priority KBAs under Improved Management Component 1 will support a grant mechanism that focuses on building capacity of CSOs to reduce threats by increasing organizational capacity, networks and partnerships to improve collaboration to improve the management of protected areas to globally important biodiversity in seven Caribbean Island countries: Antigua and Barbuda; The Bahamas; Dominican Republic; Haiti; Jamaica; Saint Lucia; and Saint Vincent and the Grenadines. At the site scale, grant-making will support conservation actions in and around 32 priority KBAs, covering a combined area of 1,171,033 hectares
- b) Component 2: Increased Capacity of CSOs in Conservation: This component will further strengthen the capacity of local, national and regional civil society in the conservation and sustainable use of biodiversity through targeted capacity development activities such as classroom-based trainings in proposal design, project cycle management, gender mainstream, and managing environmental and social risks, hands-on mentoring, development of online training materials, and dedicated knowledge exchanges.
- c) Component 3: Increased Capacity of Regional Implementation Team(RIT) in Leadership and Coordination of CSO Conservation Actions: This component will strengthen the role and widen the responsibilities of the RIT in the active hotspots vis-à-vis the CEPF Secretariat.
- d) Component 4: Strengthened CSO Partnerships for Conservation: In the context of the project, this means CSOs working with one another and in close coordination with local and national governments, private landowners, local communities to co-create analyses of and solutions to conservation challenges in non-confrontational ways. This approach is termed collaborative social accountability and will be adopted by the project to facilitate partnerships of CSOs and other stakeholders to design and implement conservation actions in and around priority KBAs.In Dominican Republic, Antigua and Barbuda, Jamaica and Saint Lucia, this component will be led by INTEC, with co-financing support and oversight from the World Bank's Global Partnership for Social Accountability. In The Bahamas, Haiti and Saint Vincent and the Grenadines, this component will be led by the RIT, learning from the experience of INTEC.
- e) Component 5: Project Management, including M&E: Components 1-4 offer potential for collaboration between island states in the hotspot and with countries in other hotspots where CEPF is active, particularly ones containing Small Island Developing States.

The Project is consistent with the Country Partnership Strategy (CPS) for FY15-18 for the Dominican Republic, Country Partnership Framework (CPF) for FY15-19 for Haiti, CPS for FY 14-18 for Jamaica and the World Bank Group FY15-19 Partnership Strategy for the OECS countries (Antigua and Barbuda, Grenada, and Nevis, St. Vincent and the Grenadines, St. Lucia, Dominica).

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D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The Project will be implemented in 32 sites in 07 countries within the Caribbean Islands biodiversity hotspot. These countries are Dominican Republic, Jamaica, Haiti, Saint Lucia, the Bahamas, Antigua and Barbuda and St. Vincent and the Grenadines. The Caribbean Islands Hotspot supports a wealth of biodiversity within its diverse ecosystems, with a high proportion of endemicity, making the region biologically unique. 62 per cent of the Caribbean Islands Hotspot's plant and animal species are found nowhere else in the world and due to the archipelagic nature of the hotspot, many of the endemic species are restricted to a single island.

The 32 selected sites are Key Biodiversity Areas (KBAs) cover around 1,171,033 hectares with about 1,066,352 hectares or 91 per cent partially or completely protected. The sites include all 17 globally irreplaceable KBAs within the hotspot and 97 per cent of the globally threatened species found within the countries (955 species). To buffer the KBAs from threats, maintain ecological connectivity and facilitate gene flow essential to ensure that species populations retain long-term viability, complementary conservation actions in the surrounding landscapes will also be funded. For this, 07 priority corridors, covering 2.3 million hectares will be targeted.

The Caribbean coastal zone contains many productive and biologically complex ecosystems, including beaches, coral reefs, seagrass beds, mangroves, coastal lagoons and mud bottom communities. The health of these ecosystems has declined over the years, due mainly to habitat conversion, overexploitation, and pollution. The hotspot's biodiversity is at serious risk of species extinctions with amphibians and reptiles among the most threatened. It has about 992 globally threatened species, making the Caribbean one of the most severely threatened hotspots in the world. All threats are intensified by the effects of climate change and climate variability.

During implementation, sub-projects will focus on reducing the threats on the globally threatened species by improving the management of the KBAs and the surrounding areas. Threats to the KBAs such spread of invasive plants and animals, and unsustainable agriculture and forestry practices in the surrounding areas will be addressed, contributing to the protection and sustainable management of biodiversity. Preparation and implementation of conservation actions plans for priority Critically Endangered and Endangered species by the Project will also contribute to the conservation of species and ecosystems that are critical for the well-being of the people. To better protect such species from the effects of climate change, the project will also finance work to identify the impacts of climate change on these species through the formulation of adaption measures and integrating them into site management plans.

Nationally, there are several laws addressing natural resource management in the countries but gaps such as in policy and legislative frameworks related to environmental impact and strategic environmental assessments and financing mechanisms exist. Challenges include policy and decision-making informed by outdated or incomplete data and information, policy inconsistency, lack of implementation of policies and limited enforcement of regulations. As institutional capacities, including technical capacities, are inadequate for the comprehensive and appropriate site and system-level protected area management, Civil Society Organizations (CSOs) have been engaging more in national and regional policy and decision-making processes and are increasingly recognized as important actors.

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This project will build on actions and efforts undertaken during the first CEPF investment phase (between 2010 and 2016, CEPF invested in the Caribbean biodiversity hotspot). It will support replication and scaling-up of good practice models implemented.

D. 2. Borrower's Institutional Capacity

The project will be implemented as a Recipient Executed Trust Fund (RETF) with Conservation International (CI) as Secretariat of the CEPF responsible for overall project implementation. CI is an international non-governmental organization based in around 30 countries with over 2000 partners including national governments, companies and CSOs. It has decades-long experience in conservation, particularly for building capacity in CSOs. The Project Implementation Unit (PIU) is the CEPF Secretariat established within CI, working in collaboration with the Regional Implementation Team (RIT) hosted at the Caribbean Natural Resources Institute (CANARI). CANARI is a regional technical non-profit organization that has been working in the Caribbean Islands for more than 20 years. The subgrants will be awarded by the CEPF Secretariat and the RIT, while the sub-grants will be implemented by the CSOs identified during the project.

CI has experience managing a previous CEPF grant on a global scale under the World Bank safeguards policies; where there were some concerns about CI's management of E&S issues in terms of monitoring capacity and stakeholder engagement; Consequently, a robust stakeholder and citizen engagement and project monitoring approach will be adopted for this project. CANARI served as the RIT during the first phase of CEPF investment in the hotspot.

During the capacity assessment exercise realized by the World Bank team, and for the formulation of this project, it was assessed that the implementing agencies (IAs) have the technical capacity to support the Project in the Caribbean region. The CEPF Secretariat headed by an Executive Director comprises of a finance team, grants monitoring team, evaluation and outreach team and a communications team working across different regions globally. The grants team is responsible for the development and oversight of the grant portfolio, technical review of grant applications and oversight of the RIT. CANARI headed by the Executive Director has specialists based across the different Caribbean countries. As part of Project preparation, both the staff of the CEPF Secretariat and CANARI directly involved in the Project received training on the World Bank Environmental and Social Framework (ESF). At the CEPF Secretariat, qualified staff will support the management of E&S risks and full compliance with the ESF and relevant instruments. The Caribbean Region's Grant Director, Grant Manager and the Managing Director, Grants will be responsible for Project implementation and they will support E&S risk management. They have the qualification and experience in managing E&S issues and were involved in the previous CEPF project "Critical Ecosystem Partnership Fund 2 (P100198)" from 2007 -2018. In addition, the CEPF Secretariat is able to tap on expertise from CI as needed. If required during implementation, consultants to support the work will be hired. Under the previous project, CEPF invested in the Caribbean Islands Biodiversity Hotspot strengthening the capacity of local CSOs and increasing the conservation and sustainable use of biodiversity in the region. CEPF strengthened the capacity of 58 local and regional Caribbean CSOs and contributed to bringing 111,496 hectares under new or expanded legal protection.

The Project will also partner with the World Bank's Global Partnership for Social Accountability (GPSA) project through an experienced institution in the region - the Instituto Tecnológico de Santo Domingo (INTEC) to apply social accountability methodologies and tools to facilitate partnerships for conservation. INTEC is a private university in Santo Domingo, the Dominican Republic offering academic programs in a number of areas such as engineering, business administration, the humanities and social sciences. INTEC has prior experience implementing WB projects

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related to social accountability but is not familiar with the ESF. The GPSA Project team will deliver training on ESF to INTEC and efforts will be coordinated to ensure the activities undertaken by INTEC are inline with the ESF requirements

Grants will be allocated to CSOs using two approaches: (i) a competitive allocation based on calls-for-proposals (accounting for at least 90% of the total budget allocated to Component 1) to be directly administered by the CEPF Secretariat; and (ii) a non-competitive allocation i.e. small grants mechanism (to fill gaps in the portfolio that cannot be addressed through competitive calls) administered by the RIT (individual small grants will not exceed USD 50,000). The CEPF Secretariat has direct oversight of the sub-projects it funds through competitive allocation and CANARI as the IA on the ground will work with the CSOs (sub-grantees), as needed, such as providing training and conducting site visits. Applicants will submit project concepts in the form of Letters of Inquiry, which will be reviewed by a technical advisory committee, following established criteria. Guided by the committee's recommendations, the CEPF Secretariat and RIT will make a joint decision on which applications to invite to the full proposal stage.

As the sub-projects will be implemented by the CSOs, they may require training on the ESF and instruments to be developed. This training may be online in the form of webinars. Provision for capacity building of the CSOs on environmental and social management is included in the Environmental and Social Commitment Plan (ESCP) of the Project.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating

Moderate

The environmental risk rating of the project is Moderate under the World Bank Environmental and Social Framework based on the location, type, sensitivity and scale of project intervention, nature and magnitude of potential E&S risks and impacts, and client capacity and ownership.

Though the Project covers a large geographical area rich in biodiversity in seven countries, the activities proposed are not likely to have significant or irreversible environmental impacts. The Project targets to improve environmental outcomes by conserving biodiversity and strengthening protection of identified priority conservation sites. By eliminating and controlling the spread of invasive species, the threats to globally threatened species populations are reduced. Moving towards sustainable practices in agriculture, fisheries and forestry in the landscapes around KBAs, will help maintain the integrity of the landscape (such as through maintaining soil quality, reducing soil degradation and conserving water) thereby enhancing landscape-scale connectivity and ecosystem resilience contributing to biodiversity conservation. No major civil works are anticipated. Fieldwork is expected to fill critical gaps in knowledge and information. Environmental impacts if any, are expected to be minor and reversible such as disturbance to wildlife during surveys or data collection and harm to non-target species during eradication of invasive species. Agricultural activities may involve the use of pesticides and the Project will promote integrated pest management. The Project supports replication and scaling-up of good practice models and incorporates lessons learned from the previous CEPF Project to ensure enhanced implementation and continuity of action. Overall, the Project is expected to have positive environmental benefits.

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The environmental impacts are not significant in nature and can be easily mitigated through mitigation measures outlined in the Project Environmental and Social Management Framework (ESMF).

Social Risk Rating Substantial

The social risk rating of the project is substantial. Although the project does not involve any civil works, it has a fairly large scope as it covers a large geographical area (1,174,380 ha) of high-value biodiversity area in multiple locations throughout the Caribbean region. Some of the areas that will be included for protected area status and conservation are located on land that is currently used for agriculture and/or forestry by local populations. Consequently, restrictions of use will result in loss of access to these lands and potentially some livelihood insecurity for the populations, albeit on a local scale. In spite of the relatively small scale of loss in "real terms", it is most likely to disproportionately affect the most vulnerable populations within the project areas and may translate into significant losses for this subset.

There is also some concern about the capacity of the sub-grantees to manage social risks in terms of exacerbation of existing patterns of social exclusion, participation and elite capture. With respect to labor, the main risk will be related to the labor practices of the RIT, the sub-grantee CSOs. The specific sub-grantees are not currently known but will be fully articulated during project implementation. There is also some implication for project impacts on vulnerable groups such as the Maroons, in Jamaica. There have been some conflicts as it relates to the autonomy of the territories. One distinct representation of these conflicts has been the government sanctioning police and army raids claiming illegal cultivation of plants within the communities, which according to the Maroons, their treaties allow them to have legally. This conflict, therefore, could potentially lead to Maroons facing disproportionate project impacts or being negatively affected by the project, especially if access to lands over which they feel they possess autonomy is restricted without proper consultation. Additionally, the project will carry out a participatory approach and will have strong social communication processes, citizen engagement, gender approach, and beneficiary feedback mechanisms, to ensure inclusion and active participation of beneficiaries from disadvantaged and vulnerable groups (the poorest, people living in slums, single-parent female-headed household, disabled, LGBT, youth at risks among others) and to avoid any kind of discrimination and exclusion that might be present in the current system in participant countries, as well as at the regional level.

A robust Stakeholder Engagement Plan (SEP) with its project-level Grievance Mechanism (GM), a Labor Management Procedure (LMP) with its Grievance Mechanism for workers, have been developed. The Process Framework (PF) will be developed by Board approval. These documents provide strategies to avoid, minimize or mitigate the risks mentioned above.

The Bank will review the Environmental and Social Risk Classification (ESRC) on a regular basis throughout the project life cycle to ensure it continues to accurately reflect the level of risk the project presents.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

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Public Disclosure

The World Bank

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ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The standard is relevant.

The Project is intended to reduce threats to globally important biodiversity in the Caribbean Islands Biodiversity Hotspot and will result in positive environmental outcomes. However, some of the project activities may have some temporary environmental impacts if any will be minor and could include disturbance to wildlife from increased noise and activities during surveys or data collection, promotion of nature-based tourism leading to increased waste, harm to non-target species during eradication of invasive species and trespassing into sensitive areas. Sustainable agriculture practices may utilize pesticides. This is further discussed under ESS3.

Though the details of the sub-projects proposed under Component 1 are not known at this stage, they will not include any major civil works. Minor works may include the construction of nurseries or greenhouses. Component 1 will also finance the preparation and implementation of a limited number of conservation actions plans for priority critically endangered and endangered species and activities that mainstream biodiversity conservation and ecosystem service values into development policies, projects, and plans by governments and the private sector such as those focusing on water resources management and reforestation. From an environmental perspective, the project impacts, if any, are likely to be site-specific and not significant. In the wider landscape around priority KBAs, the lands are mostly used for agriculture, forestry or other economic activities and promoting sustainable practices will reduce the pressure on the natural environment. Agriculture activities may involve the use of pesticides which could lead to pollution of the surrounding environment and affect human health and if not managed adequately. The project's activities such as increased monitoring of areas which are legally protected, but protection is either not enforced or under-enforced to ensure that these areas are not exploited or used, could represent social risks in terms of restrictions of use of natural resources and to ecosystem services, economic displacement, and could potentially affect livelihoods of vulnerable peoples. These risks, as well as risks in terms of inclusive participation, are addressed under ESS5 and 10.

Component 2, 3 and 4 will involve capacity building and are not anticipated to have negative environmental impacts. Capacity building for CSOs and the RIT will strengthen their capacity to develop and implement conservation initiatives. The main social risks associated to these activities are related to the potential inefficiency of the outreach strategy of the project, that could further exacerbate existing patterns of social exclusion, participation, and elite capture. Therefore, the project could have some negative impacts on vulnerable groups including, but not limited to, households that depend on agriculture within the project area, women, children, LGBT, youth at risk, ethnic minorities and the Windward and Leeward Maroons; who because of their circumstances could be excluded from stakeholder and Citizen Engagement Processes. The latter is present in two of the priority sites in Jamaica- The Blue and John Crow Mountains and the Cockpit Country. These impacts may include the exacerbation of the existing patterns of exclusion of these groups from decision-making processes as well as the benefits of projects.

An Environmental and Social Management Framework has been prepared for the Project to assess and manage the environmental and social risks and impacts. All sub-project applications will be screened against an eligibility criteria and the negative list given in the ESMF. Those sub-projects that advance to the proposal stage will undergo a risk assessment. Based on the risk level, the due diligence required such as developing environmental and social impact assessments (ESIAs) and ESMPs will be identified. High risk sub-projects and activities on the negative list will not be

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financed. Mitigation measures and actions to be implemented will be developed inline with the mitigation hierarchy as described in the ESMF. The ESMF describes pest management procedures including key elements of an IPMP. Activities such as those under Component 3 may fall under Type 1 and Type 3 Technical Assistance (TA). The requirements set out in paragraphs 14–18 of ESS1 will be applied to TA activities as relevant and appropriate to the nature of the risks and impacts. The terms of reference for the capacity building activities and other documents defining the scope and outputs of TA activities will be reviewed so that the advice and other support provided are consistent with ESS 1–10. Sub projects' activities will also seek to identify all vulnerable groups within the subproject locations and implement methods that reduce the barriers to them participating in and receiving project benefits and in line with the SEP with its GM developed by the project will ensure the inclusion of all project stakeholders during implementation. LMP with the related GM for workers has also been developed. All instruments (ESMF, SEPand LMP) will be disclosed by the Client prior to appraisal. The Bank will disclose these intruments prior to appraisal. The Process Framework will be developed and disclosed prior to Board approval.

The CEPF Secretariat (the client), in agreement with the Bank, has drafted the ESCP which covers all measures and actions needed to ensure compliance with the ESF and the Project's environmental and social instruments as well as implementation details, monitoring and reporting activities.

ESS10 Stakeholder Engagement and Information Disclosure

The standard is relevant.

The project stakeholders are: i) government ministries and agencies, particularly those involved in the process of declaring protected area status for biodiversity hotspots. These may include Ministries of Agriculture and/ or Environment or any national-level agencies responsible for environmental protection; ii) Civil society organizations involved in biodiversity protection and conservation such as the Nature Conservancy, the Jamaica Environment Trust, the Saint Vincent and the Grenadines Conservation Fund and the Bahamian Environment Protection Foundation, among others; iii) along with any communities that are located in or within close proximity to the identified priority area are also stakeholders. Vulnerable groups may include low-income, farming, agro-forestry or female-headed households, ethnic minorities and the Jamaica Maroons who may depend on parts of the newly protected areas for their livelihoods and whose access to these areas may be restricted by the project.

In consultation with the Bank, the client has developed and will implement a SEP proportional to the nature and scale of the project along with its associated risks and impacts. The specific objectives of the stakeholder engagement plan are as follows: (i) To build and maintain a constructive relationship with stakeholders; (ii) To assess the level of stakeholder interest and support for the Project and to enable stakeholders' views to be taken into account throughout the project cycle; (iii) To promote and provide means for effective and inclusive engagement with stakeholders throughout the project life cycle on issues that could potentially affect them; and (iv) To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.

The project level SEP contains guidance for the development of the sub-grantee level SEP. The SEP outlines a) who the key stakeholders are; b) how the subprojects are to be engaged; c) how often the engagement will occur

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throughout the project; d) how feedback will be solicited, recorded and monitored over the project; e) who will be charged/responsible with this engagement; f) timeline for this engagement, budget, and so on. Additionally, the SEP describes measures that will be used to remove obstacles to stakeholder participation and how stakeholder views will be captured. The SEP identifies vulnerable groups and outline the methods that will be used to eliminate barriers to their participation in project consultation in participant countries and contains a checklist of activities that will guide communication and consultation processes of the implementing agency and sub-grantees, and to ensure: citizen engagement, non-discrimination, a gendered approach, and beneficiary feedback mechanisms. Given the global Covid-19 pandemic, the SEP includes considerations for virtual consultations, in a manner consistent with the World Bank technical guidance on "Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings" (March 20, 2020), when and where face to face consultations are not feasible. The SEP includes a Grievance Mechanism, that will be updated during implementation, and that will receive and facilitate the resolution of any project-related concerns and/or complaints. The draft SEP has been prepared and will be disclosed prior to appraisal. The client will continue to solicit stakeholder feedback on the SEP and ensure that any consultation activities are inclusive and accessible to all project stakeholders. The stakeholder engagement process has begun during project preparation and will continue throughout project implementation. The SEP is a living document and will be updated periodically as needed.

At the sub-grantee level, a more extensive list of stakeholders will be identified during subproject preparation and will be part of their respective SEPs and proportionate to the scope and risks of the respective sub-projects. For this, the project level SEP contains guidance for the development of the sub-grantee level SEP which is in line with the content of the project level SEP. The project and sub-grantees will report against the stakeholder feedback indicator(s) that are in the SEP and will implement the beneficiary feedback indicator that is included in the PAD-Results Framework.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

The standard is relevant.

The project will engage with direct and contracted workers. NGOs that will be implementing the sub-grants may be engaging community workers.

At the sub-grantee level, project activities will be mainly implemented by the staff of the NGOs. The staff of the NGOs who are expected to work in connection with the project, whether full-time or part-time, but not hired by the project, will remain subject to the terms and conditions of their existing employment agreement or arrangement unless there has been an effective legal transfer of their employment or engagement to the project. For these employees, only the provisions of Protecting the WorkForce Occupational Health and Safety of ESS2 will apply. The project will not utilize primary supply workers.

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The project has prepared Labor Management Procedures with its accompanied Grievance Mechanism for workers prior to appraisal. The project level LMP addresses an overview of labor use on the project; Assessment of key potential labor risks with its mitigation measures; Brief overview of labor legislation; Terms and conditions for employment; Brief overview of labor legislation on occupational health and safety; responsible staff; policies and procedures; the age of employment; grievance mechanism with measures to address Gender-Based Violence (GBV); contractor management, measures for when engaging with community workers (if any), and a code of conduct. The LMP also includes Covid-19 considerations as they relate to project workers which follow both the WHO guidelines along with the World Bank's interim note, "Covid-19 Considerations in Construction and Civil Works Projects". The project will ensure that sub-grantees follow the procedures outlined in the LMP. For this, the project level LMP contains guidance for the development of the sub-grantee level LMP.

The LMP is a living document and will be regularly reviewed and updated during all stages of the project's life cycle.

No community workers will be engaged by CI in relation to activities at the project level. However, subgrantees can be engaged with community workers. In that circumstance, the project will ensure that subgrantees: (i) Ascertain whether such labor is or will be provided on a voluntary basis as an outcome of individual or community agreement. These measures and how to ascertain them will be documented in the LMP- This will include a) clearly identifying the terms and conditions on which community labor will be engaged (if applicable, the amount and method of payment), (ii) set out the times of work, and (iii) specify the way in which community workers can raise grievances in relation to the project.; (ii) Assess working conditions and Occupational Health and Safety in relation to community labor. This assessment will be applied, proportionate to: a) the nature and scope of the project; (b) the specific project activities in which the community workers are engaged; and (c) the nature of the potential risks and impacts. If indicated as necessary by the assessment, at a minimum, apply the relevant requirements of the WBG general and specific EHS Guidelines as detailed in the ESMF. Considerations for protecting the project workers, particularly those deployed to remote rural areas, from contracting COVID-19 will be included, following World Bank interim guidance notes as referenced above; (iii) Assess whether there is a risk of child labor or forced labor. If cases of child labor or forced labor are identified, CI will take appropriate steps to remedy them -child labor will not be allowed under the project. The sub-grantees level LMP will set out roles and responsibilities for monitoring community workers; and (iv) Provide adequate training to community workers tailored to their needs and the potential risks and impacts of the project.

ESS3 Resource Efficiency and Pollution Prevention and Management

This standard is relevant.

Sustainable agriculture under Component 1 may utilize pesticides. The ESMF describes the procedures for integrated pest management and the key elements of an IPMP. IPMPs will be prepared for relevant sub-projects during sub-project implementation, promoting ecologically based pest control practices that seek to reduce reliance on synthetic chemical pesticide.

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ESS4 Community Health and Safety

The standard is relevant, as the Project will fund activities in production landscapes where communities may reside. The ESMF makes provision to review the community health and safety in sub-projects planning and implementation.

The use of security personnel by the IA or by sub-grantees is not expected. However, considering the level of violence and political uncertainty in some of the participant countries such as Haiti, along with the issues related to border control between Haiti and the Dominican Republic, the use of security personnel may become necessary. The ESMF reflects that the sub-grantees will assess the risks posed by the security arrangements and this will be included in the site-specific ESMPs.

As outlined in the ESMF, the client and sub-grantees will assess risks posed by security arrangements to those within and outside the project site. The client and sub-grantees will not sanction any use of force by direct or contracted workers in providing security except when used for preventive and defensive purposes in proportion to the nature and extent of the threat. In the case of needing external contracting services, and to implement any service related to the project, the client, sub-grantees and or contractor will: (i) make reasonable inquiries to verify that the direct or contracted workers to provide security are not implicated in past abuses; (ii) train them adequately (or determine that they are properly trained) in the use of force (and where applicable, firearms), and appropriate conduct toward workers and affected communities; and (iii) require them to act within the applicable law and any requirements set out in the ESCP. The client and sub-grantees will review all allegations of unlawful or abusive acts of security personnel, act (or urge appropriate parties to act) to prevent recurrence and, where necessary, report unlawful and abusive acts to the relevant authorities. Code of conduct has been incorporated into the ESMF and to be adopted and implemented in site-specific Environmental and Social Management Plans, as relevant.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The standard is relevant.

Component 1.1 will finance technical and legal processes to strengthen legal protection for priority sites that are currently unprotected or under-protected. This could include the increased "policing" or monitoring of these unprotected or under-protected areas to ensure persons are not exploiting the resources. Component 1.2 will finance activities that contribute to the protection and sustainable management of biodiversity in the wider landscape around priority KBAs. Some of these KBAs are located within landscapes used for agriculture or forestry. These legal protection strengthening activities could result in some restrictions on access to land traditionally utilized by populations in the priority areas for agriculture and forestry. To mitigate this, the client will prepare a Process Framework (PF) prior to Board approval. The PF will be used to design project activities, determine eligibility criteria, reach agreement on access restrictions, identify measures to assist affected persons in improving or restoring their livelihoods, manage conflicts and grievances, and arrange for participatory implementation and monitoring. The PF will be disclosed by the client and on the bank's website prior to Board approval.

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ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This standard is relevant. The sub-activities will take place in biodiversity hotspots. Of the 32 KBAs that have been identified as a priority for conservation, 17 KBAs are considered wholly irreplaceable on a global scale because they contain the only known populations of a globally threatened species. Since the sites are irreplaceable for Critically Endangered and Endangered species, they also qualify as Alliance for Zero Extinction (AZE) sites, the most urgent site-level conservation priorities on a global scale. The Project will fund sub-projects to strengthen the protection of selected sites and build local capacity. Under sub-component 1.3 conservation actions plans for some priority Critically Endangered and Endangered species will be prepared and implemented. As specific sub-projects to be funded are unknown at this stage, an ESMF has been developed. All potential sub-projects will be screened against an eligibility criteria and the negative list. High risk sub-projects and those on the negative list will not be funded. If needed site-specific ESIA/ESMPs will be prepared to identify and manage the impacts inline with the mitigation hierarchy.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

This standard is currently not relevant. There are no persons who meet the definition of indigenous people present in the project's area of influence.

ESS8 Cultural Heritage

This standard is considered relevant since the project activities will be implemented in areas that may be valued for their cultural heritage, both tangible and intangible. Sub-project screening as described in the ESMF will determine the existence of tangible or intangible cultural heritage. The ESMF includes chance find procedures taking into account the national legislation and the requirements under ESS8. Additionally, the ESMF includes guidelines to prepare a Cultural Heritage Management Plan (if needed), to ensure all potential impacts on traditional conservation practices, and/or natural features with cultural significance to local communities are properly managed.

ESS9 Financial Intermediaries

The standard is currently not relevant, as there are no FIs involved in the project.

B.3 Other Relevant Project Risks

There are no other relevant Project risks identified at this moment.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

No

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CRITICAL ECOSYSTEM PARTNERSHIP FUND - CARIBBEAN HOTSPOT PROJECT (P173464)

The project doesn't include activities which would involve the use or potential pollution of any international waterway.

OP 7.60 Projects in Disputed Areas

No

No disputed areas are part of the intended project area of influence.

B.3. Reliance on Borrower's policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework?

No

Areas where "Use of Borrower Framework" is being considered:

None

IV. CONTACT POINTS

World Bank

Public Disclosure

Contact: Juan Jose Miranda Montero Title: Senior Environmental Economist

Telephone No: +1-202-473-8558 Email: jjmiranda@worldbank.org

Borrower/Client/Recipient

Borrower: Conservation International

Implementing Agency(ies)

Implementing Agency: Conservation International Foundation

Implementing Agency: Conservation International

V. FOR MORE INFORMATION CONTACT

The World Bank 1818 H Street, NW Washington, D.C. 20433 Telephone: (202) 473-1000

Web: http://www.worldbank.org/projects

VI. APPROVAL

Task Team Leader(s): Juan Jose Miranda Montero

Practice Manager (ENR/Social) Maria Gonzalez de Asis Cleared on 04-Jan-2021 at 17:27:32 GMT-05:00

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