

**INTEGRATED SAFEGUARDS DATA SHEET  
CONCEPT STAGE**

Report No.: AC5603

**Date ISDS Prepared/Updated: 07/20/2010**

**I. BASIC INFORMATION**

**A. Basic Project Data**

Country: South Asia	Project ID: P121210
Project Name: Strengthening Regional Enforcement for Wildlife Protection	
Task Team Leader: Richard Damania	
Estimated Appraisal Date: August 18, 2010	Estimated Board Date: September 30, 2010
Managing Unit: SASDI	Lending Instrument: Adaptable Program Loan
Sector: General agriculture, fishing and forestry sector (70%);General public administration sector (30%)	
Theme: Biodiversity (80%);Environmental policies and institutions (10%);Other trade and integration (10%)	
IBRD Amount (US\$m.):	0.00
IDA Amount (US\$m.):	40.00
GEF Amount (US\$m.):	0.00
PCF Amount (US\$m.):	0.00
Other financing amounts by source:	
<u>BORROWER/RECIPIENT</u>	0.00
	0.00

**B. Project Objectives [from section 2 of PCN]**

1. To assist participating governments to build or enhance shared capacity, knowledge and incentives to jointly tackle illegal wildlife trade and other regional conservation threats. The project will focus on a selected set of country-specific initiatives that are crucial to meeting the regional strategic goals.

**C. Project Description [from section 3 of PCN]**

2. The project would be structured around three themes (i) capacity building for addressing the illegal trans-boundary trade in wildlife parts, (ii) a virtual regional center of excellence (iii) project coordination and communications. To date, two countries have requested to participate in the project - Bangladesh, and Nepal and it is anticipated that others may also join. It is emphasized that, if India joins the project, there would be no direct investments in protected areas and other wildlife habitats. This recognizes that considerable resources were previously available in India for Protected Area (PA) management and the reputational risks associated with such investments. This sensitivity can be traced to legacy issues wherein some NGOs have been critical of the World Bank and its previous engagement in protected areas.

3. The project would utilize a horizontal APL structure in which support is made available based on country readiness. This larger regional program will provide confidence and a signal of a long term commitment and engagement by the Bank in conservation. Since this APL aims to support a new initiative for now the focus is on the critical elements of capacity building and the program, and will be agreed in advance with the respective governments. A key advantage of a horizontal APL is that other countries (notably India which is the primary source of poaching, Sri Lanka- which, is allegedly an entrepot in the wildlife trade to East Asia; and Bhutan, the principal un-policed corridor to China) could join at a later stage when there is a commitment to participate in a regional IDA initiative.

#### Project Components:

(i) Capacity building and cooperation for addressing the trans-boundary illegal wildlife trade.

4. The trade in illegal wildlife commodities is international. Wild animals are typically poached in India, Nepal, Bhutan or Bangladesh and then transported across borders to their final destination in East Asia. The trade is controlled by criminal organizations that have considerable control of the market and over the prices paid to poachers and carriers, making control of the trade more challenging. Lack of consistency in the enforcement of controls remains one of the greatest problems in the region.

5. The proposed project would provide regional support through capacity building for the agencies in each country to address the trafficking of wildlife commodities. It would support collaborative efforts and linkages between these countries as well as with ASEAN -WEN (Wildlife Enforcement Network). It would also support the first steps towards a South Asia Wildlife Enforcement Network (SA WEN) if there is formal agreement to establish such an organization in the region. Awareness raising activities and training of border and customs officials will be another priority. Staff trained for improved border enforcement would become a valuable and fungible resource because well trained officers would disseminate their knowledge as they rotate through positions in various parts of their respective countries. This component could also include the development/upgrading of a forensic laboratory in one or more of the collaborating countries, the use of which would be open to the others in the prosecution of wildlife-related crimes.

6. The Indian Wildlife Crime Control Bureau (WCCB) is seen as a useful model. In fact, Nepal is discussing the replication of this model which would be supported by the project. There are indications the Government of Bangladesh may also consider establishing a cell to address wildlife crime issues. Based on the identified and agreed national priorities after completing stakeholder consultations, the regional initiative would help establish a regional network for combating trans-boundary illegal trade in wildlife products.

(ii) A virtual regional center of excellence.

7. This component would support the creation of a Virtual Center of Excellence to (a) conduct applied research and disseminate knowledge on wildlife conservation; (b) finance and

pilot innovative schemes customized to the South Asia context in subsequent phases; and (c) share best practices to enhance conservation. Examples could include mitigate human-wildlife conflict, and best practices to suppress poaching and illegal trade. The Center could also support "action research" in which innovative conservation approaches could be tested, using models developed in the Center or adapting successful models from other countries. When there is an opportunity to consider new policies, revision of regulations or new enforcement approaches, the Center could provide assistance in drafting regulations or hold workshops to discuss the new possibilities with policy makers. The Center would also develop teaching materials and training courses for wildlife conservation in each of the participating countries.

8. **Competitive Fund to Support Pilot Projects.** Following the tested model of the Critical Ecosystem Partnership Fund (CEPF), the Center would manage a Fund that would seek to improve the competencies of country and regional wildlife conservation players through provision of financing for pilot initiatives chosen through a competitive proposal submission and selection process. Pilot projects could focus on areas such as: techniques for the census and monitoring of wildlife populations; approaches to reducing human-wildlife conflict; ecotourism circuits encompassing various destinations allowing tourists to observe different aspects and phases of regional wildlife; and assuring connectivity of habitats.

#### **D. Project location (if known)**

9. Activities supported by the project would take place throughout Bangladesh and Nepal. Field-based activities will be located in areas where wildlife abounds, at border-crossing points, and other strategic locations.

#### **E. Borrower's Institutional Capacity for Safeguard Policies [from PCN]**

10. The institutional capacity of the borrower countries varies in terms of environmental policies and compliance with environmental rules and regulations. However, both countries have Ministries of Environment and have legal and regulatory provisions in place. There are environmental protection procedures including Environmental Assessment Policies as a permit requirement of new projects that have the potential for environmental impact in each of the participating countries. Project designs are reviewed and Environmental Impact Assessments are required for projects above a certain size. As is typical in developing countries, enforcement capacity is low and there is a potential for corruption.

11. The scale and nature of proposed investments are unlikely to result in any significant adverse environmental or social impacts. Since enforcement capacity varies across countries, the proposed project would support strengthening of environmental enforcement capacity as regards illegal wildlife trade and the development of good practices for ecosystem and protected area management especially in cross-border areas. Based on the potential for adverse impacts, the project would develop a negative list of investments that will not be financed.

12. Prior to appraisal, participating countries would develop environmental and social screening frameworks to ensure that all regional investments at the country level are screened for any potential adverse safeguards related impacts as per IDA and country-specific policies and regulations. Qualified screeners would be hired (or upgraded) and trained for this task. Subprojects identified as having a potential for adverse environmental or social impact (as

defined by IDA policies) would be subjected to additional screening to determine whether they are able to offset (mitigate) the potential impacts in the subproject context, without a disproportionate increase in cost. The cost of mitigation, provided it is judged to be feasible, will be borne by the subproject but the proponent will be held accountable for implementation, monitoring and evaluation. The screening will be further reviewed at the regional project management level. Full safeguards procedures would apply to subsequent phases of the APL that may (or may not) have additional safeguard implications.

#### **F. Environmental and Social Safeguards Specialists**

Mr Daniel R. Gross (LCSUW)  
 Mr Shakil Ahmed Ferdausi (SASDI)  
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## **II. SAFEGUARD POLICIES THAT MIGHT APPLY**

<b>Safeguard Policies Triggered</b>	<b>Yes</b>	<b>No</b>	<b>TBD</b>
<b>Environmental Assessment (OP/BP 4.01)</b>	<b>X</b>		
<p>As stated above, no major environmental issues are expected in the implementation of this project. The primary focus of the project is to build capacity through training, better communication and increased support for human resources. Each participating country will prepare an Environmental Assessment Framework (EAF) and Environmental Management Framework (EMF) outlining the procedures to be followed in screening subprojects, allocating specific accountabilities, and designing feasible, cost-effective solutions to impacts that may be identified. Responsibility for designing and implementing EMPs rests with project proponents as well as monitoring and evaluation and the costs of mitigation will be incorporated into project costs. The project will have a list of activities that will be ineligible for funding under the project. In addition, country specific screening frameworks will be developed and applied to all sub-projects. The project would also help prepare ESMF (when there may be a likelihood of impact) to prepare countries address environmental and social issues during post project period.</p> <p>In addition, existing guidelines, for example, IFC/WB#s guidelines on health and safety related issues would be applied for investments that refurbish infrastructure. A checklist for applicable guidelines and where these needs to be applied would be prepared and incorporated in project design.</p>			
<b>Natural Habitats (OP/BP 4.04)</b>	<b>X</b>		
<p>While this policy is triggered, the project investments would be designed to result in better management of natural habitats. No natural habitats would undergo transformation of use with support from the project. For instance, reduced poaching or better managed ecotourism would strengthen and boost the conservation efforts. Project supported capacity building in management and patrolling will result in better protection of these areas. Natural habitats would greatly benefit from realization of project objectives in curbing illegal wildlife crimes.</p>			
<b>Forests (OP/BP 4.36)</b>		<b>X</b>	
<b>Pest Management (OP 4.09)</b>		<b>X</b>	
<b>Physical Cultural Resources (OP/BP 4.11)</b>		<b>X</b>	
<b>Indigenous Peoples (OP/BP 4.10)</b>			<b>X</b>
<p>All of the countries have indigenous populations. It is possible that project activities would indirectly affect such groups living in or near protected areas or involved (directly or indirectly)</p>			

<b>Safeguard Policies Triggered</b>	<b>Yes</b>	<b>No</b>	<b>TBD</b>
with the illegal wildlife trade. The countries will prepare separate IPFs outlining the procedures to be followed to bring any subproject that might have an impact --positive or adverse # into compliance with OP/BP4.10. The IPF will outline mandatory procedures for any proponent of a subproject affecting a tribal people to carry out the necessary culturally sensitive consultations and to allow indigenous people to participate in the benefits of the project.			
<b>Involuntary Resettlement (OP/BP 4.12)</b>		<b>X</b>	
<b>Safety of Dams (OP/BP 4.37)</b>		<b>X</b>	
<b>Projects on International Waterways (OP/BP 7.50)</b>		<b>X</b>	
<b>Projects in Disputed Areas (OP/BP 7.60)</b>		<b>X</b>	

**Environmental Category:** B - Partial Assessment

### III. SAFEGUARD PREPARATION PLAN

- A. Target date for the Quality Enhancement Review (QER), at which time the PAD-stage ISDS would be prepared: N/A
- B. For simple projects that will not require a QER, the target date for preparing the PAD-stage ISDS: 08/16/2010
- C. Time frame for launching and completing the safeguard-related studies that may be needed. The specific studies and their timing<sup>1</sup> should be specified in the PAD-stage ISDS.  
 For Launching - July 19, 2010  
 For Completion - August 15, 2010

### IV. APPROVALS

<i>Signed and submitted by:</i>		
<b>Task Team Leader:</b>	<b>Mr Richard Damania</b>	<b>07/14/2010</b>
<i>Approved by:</i>		
<b>Regional Safeguards Coordinator:</b>	<b>Mr Sanjay Srivastava</b>	<b>07/14/2010</b>
<b>Comments:</b>		
<b>Sector Manager:</b>	<b>Mr Gajanand Pathmanathan</b>	<b>07/13/2010</b>
<b>Comments:</b>		

<sup>1</sup> Reminder: The Bank's Disclosure Policy requires that safeguard-related documents be disclosed before appraisal (i) at the InfoShop and (ii) in-country, at publicly accessible locations and in a form and language that are accessible to potentially affected persons.

