CRITICAL ECOSYSTEM PARTNERSHIP FUND

Environmental Impact Assessment
and
Environmental Management Plan

27/3/2018

CEPF Grant 103913

United Purpose

Integrated Mangrove Forest Management and Livelihoods in Nigeria (IMFOMALN) Project

Cross River State, Nigeria

Grant Summary

1. Grantee organization.
United Purpose (UP).

2. Grant title.
Integrated Mangrove Forest Management and Livelihoods in Nigeria (IMFOMALN) Project – Critical Ecosystem Partnership Fund

3. Grant number.
CEPF-103913

4. Grant amount (US dollars).
$260,000

5. Proposed dates of grant.
1 July 2018 – December 2020

6. Countries or territories where project is located.
Cross River State, Nigeria

7. Full name, title, telephone numbers, and electronic mail address of Grantee personnel responsible for the health and safety plan.
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8. Summary of the project.
The Integrated Mangrove Forest Management and Livelihoods in Nigeria (IMFOMALN) Project will support 15 communities in three Local Government Areas (LGAs) to carry out sustainable forest management and livelihoods practices over a period of 30 months. The project aims to generate increased awareness on mangrove conservation needs and support communities to translate their commitment into the development, implementation and enforcement of practical and comprehensive Sustainable Community Forest Management Plans. The project will also build the capacity of Mangrove Action Watch (MAW), a Community-Based Organization dedicated to mangrove management and conservation. Targeted support will be provided to increase the productivity, profitability and sustainability of (agricultural) livelihoods activities that can form viable alternatives to activities that drive ecosystem depletion and destruction. The project will also support MAW and their communities to regenerate areas of depleted forest, as well as to establish and operate woodlots for sustainable firewood harvesting – further reducing reliance on mangrove resources. Finally, the project seeks to contribute to the body of evidence on participatory forest management and alternative livelihoods approaches.

9. Date of preparation of this document.
27 March 2018

10. **Status of area to be impacted:** This section should describe the applicant's understanding of the site.

The Integrated Mangrove Forest Management and Livelihoods in Nigeria (IMFOMALN) project will be implemented in 15 mangrove-dependent communities in three (3) Local Government Areas (LGAs) in Cross River State: Akpabuyo, Calabar South, and Odukpani LGAs. These LGAs all form part of the South East Niger Delta Region (fw10). The entire mangrove forest cover in Cross River State is an estimated 48,000 hectares, with another 52,000 hectares covered by swamp forest. These areas cover five Local Government Areas – three of which will be targeted by the project. The total area surface of the South East Niger Delta (fw10) is 269,451 hectares.

The mangrove forests in the project area have the status of 'Community Forest'. The Cross River State Forestry Law (2010) defines a Community Forest as a forest area on community land in which the communities have traditionally and on the basis of customary law exercised Exclusive User Rights. The Cross River State Government owns all land in the State.

Nigeria's current deforestation rate is estimated at 3.7% - one of the highest rates in the world. Experts suggest that global loss of mangroves is 7 million hectares a year, which is equal to 2 years of global loss of all forest systems, stressing the fact that the rate of mangrove loss is much higher than other tropical forests and coral reefs combined. In Calabar South LGA, for example, during the period 1991-2011, average of 1.69 km^2 of mangrove was depleted each year, representing 31.12% of the total area. Yet, unlike other forest types, there are currently no protected mangrove areas in Nigeria, despite their size and status of being 'critically endangered'.

There are four key threats to the mangrove forest ecosystem of the South East Niger Delta that the project will directly address:

I. **Unsustainable logging.** A ban on logging applies to all of Cross River State since 2008, but faces challenges in enforcement. The mangroves are a rich source of timber and are therefore highly under pressure from illegal logging by timber business. Usually the woods are sawn, processed in-situ into logs and/or planks and floated along the waterways to designated locations in the State, or most times to neighbouring States of Akwa Ibom, Abia and Ebonyi from where they are transported to other parts of Nigeria. Undeveloped transport systems and the absence of forestry check points in the waterways mean that government institutions responsible for enforcing forest regulations are unable to do so. Furthermore, mangrove forest dependent communities that live in the area and are able to support rule enforcement feel estranged from decision-making and implementation processes and show apathy to forestry activities, sometimes with some of their members supporting illegal timber trading.

II. **Unsustainable firewood harvesting.** The population primarily depends on the mangrove areas for fishing and firewood, both for subsistence and commercial purposes. The main mangrove species felled for this purpose are *Avecinnia* and *Rhizophora.* Fish smoking is a key activity in the area, and in the absence of any effective Sustainable Forest Management Plans often leads to unsustainable harvesting of firewood. This includes indigenous mangrove species critical to the preservation of the ecosystem. There is increased firewood scarcity in certain mangrove areas, forcing households to buy firewood, which constitutes an additional strain on household income and increases pressure on other areas.

III. **Overfishing.** Fishing is the dominant traditional livelihood in the entire area. However, high demand for fish in combination with mangrove forest depletion has significantly reduced fish stocks. Deforestation and marine depletion also has an impact on a range of other species, affecting the food chain and resulting in habitat loss.

IV. ***Nypa* palm invasion.** *Nypa* palm invasion is directly related to deforestation – it thrives on open coastlines created when mangroves are felled. This allows it to rapidly replace indigenous mangrove species, which need a longer time to grow (back). *Nypa*, without the broad tap roots of the indigenous mangrove species, does not harbour the same rich ecosystem as the indigenous species, threatening marine life. This constitutes an additional threat to already unsustainable rates of overfishing. It also does not offer the same level of protection to coastal erosion.

The direct drivers identified should be addressed together with indirect drivers, such as low levels of awareness among the population, pressure from population growth, settlements and infrastructural development, poverty and political instability and poor governance. This call is urgent as the impacts are already felt. For instance, between 2000 and 2010, fish catch had drastically reduced from nearby fishing sites in creeks and rivers, with a corresponding reduction in income among fishing households by 70%. Mangrove habitats play an important role in regulating water flows, protecting against floods and storm surges and controlling erosion. This is key to the resilience of communities in the area, especially in light of climate change. Incidences of coastal erosion and devastating floods are increasing every year, acerbating the threat to, and vulnerability of, populations in and around the mangrove ecosystem.

11. **Approach**: This section will describe proposed actions during the project. Specifically, what do you intend to do and how will you do it?

Component 1: Demonstrate a model for sustainable participatory mangrove forest management and promotion of mangrove-friendly behavior.

Responding to:
Threat 1: *Insufficient development and implementation of Sustainable Forest Management Plans and the Forestry Law.*
Opportunity 1*: Existence of legal and institutional framework for participatory forest management.*

Activities

- Inception meetings at community level (focus on livelihoods) and cluster level (focus on environment).
- Support visits to audit existing and develop/elaborate Community Forest Management Plans.
- Facilitate 3 meetings to validate Community Forest Management Plans with relevant (State/Local Government) stakeholders.
- Support a Community-based Organization (Mangrove Action Watch) to implement and enforce the plans.
- Develop and print information and communication materials on sustainable mangrove management.
- Support MAW to carry out community education/awareness raising activities (townhall meetings, school visits, film/documentary showing).

Component 2: Build capacity of Mangrove Action Watch to drive sustainable forest management and voice community demands for conservation.

Responding to:
Threat 2: *Weak linkages between communities, Traditional Leaders, Local Governments and State Governments in carrying out sustainable forest management responsibilities.*
Opportunity 2: *Existence of Mangrove Action Watch as Community-Based Organization dedicated to driving sustainable mangrove management at community level.*

- Guide the registration process of Mangrove Action Watch with the Cross River State Ministry of Environment.
- Provide technical training to Mangrove Action Watch on participatory forest management.
- Conduct a training for Mangrove Action Watch on project development and management.
- Conduct a training for Mangrove Action Watch on advocacy.
- Facilitate bi-annual meetings between MAW (2 representatives per community) and a representative from the Local Government Council and Forestry Commission.

Component 3: Supporting viable and sustainable livelihoods not reliant on mangrove resources

Responding to:
Threat 3: *Unsustainable reliance of livelihoods on mangrove ecosystem resources.*
Opportunity 3: *Community engagement in small-scale agriculture with potential to become viable businesses/alternative livelihoods.*

- Support the registration of 15 cooperatives with the Cross River State Cooperatives Society.
- Provide business development training for all 15 cooperatives.
- Training on farming, marketing and processing and environmental and health and safety standards.
- Construction/installation of infrastructure and equipment for improved farming/processing.
- Stocking/provision of seed animals
- Communities lead through production cycles
- Meetings with retailer of low-cost fuel-efficient kilns.
- technical follow-up support and monitoring of environmental and health and safety protocols.
- Borehole construction (palm oil and fish communities).
- Training on Village-Level Operations and Management (VLOM) of the borehole.

Component 4: Facilitate mangrove regeneration and management of woodlots for sustainable firewood harvesting

Responding to:
Threat 4: *Insufficient availability of sustainable firewood sources and slow regeneration of depleted mangrove areas.*
Opportunity 4: *Firewood and fish scarcity driving community demand for controlled and sustainable harvesting.*

- Select a site for mangrove regeneration and woodlots.
- Conduct a training on the Cross River State Forestry Law.
- Develop a nursery for mangrove and woodlot species.
- Establish a mangrove regeneration site and a woodlot site.

Component 5: Build evidence base on models for participatory forest management and alternative livelihoods approaches in mangrove areas.

Responding to:
Threat 5: *Little documented evidence to inform decision-making, programming and advocacy on participatory mangrove forest management and alternative livelihoods.*
Opportunity 5: *UP/NGOCE experience in and contribution to Cross River State's mangroves status as global mangrove pilot site under UN-REDD+.*

- Conduct a baseline study.
- Facilitate an exchange visit for MAW to other Community-based Organizations committed to conservation of the Cross River State Rainforest.
- Attend CEPF country workshop.
- Facilitate learning exchange visits between community representatives.
- Conduct regular monitoring and learning visits.
- Conduct a final review.

12. **Anticipated impact:** this section will describe the impact and how this impact has been determined.

Component 1: No anticipated impact
Component 2: No anticipated impact
Component 3: Minimal anticipated impact

Minimal impact could be anticipated in the support for sustainable livelihoods activities. All activities have been designed to have a positive impact on the ecosystem/environment. In a similar, previous project, no negative environmental/social impacts were identified. All activities are currently already practiced in the communities, though at smaller scale.

However, the introduction of fish ponds, semi-mechanized processing, and intensive pig/poultry rearing could potentially have an environmental/social impact (details in table 1).

Livelihoods Activity	Risks	Likelihood
Fish ponds	**Introduction of exotic species** into the freshwater environment. This risk is minimal because only native catfish species will be used in the fish ponds.	Minimal
Cassava Processing	**Waste generation.** Cassava processing (into Gari) generates waste in the form of peels, fibrous materials, liquor and waste water. *The solid waste* in cassava processing comprises the cassava peels, fibrous material and chaff. The *liquid waste* is composed mainly of the liquor pressed out of the pulp and that obtained after washing the peeled roots. - Often, this is drained away into the bush or communities. This can change aquatic ecology and affect plant, animal and human health. If the wastewater is used for irrigation, cyanide concentrations can have a negative impact on plant growth and development. - Finally, inadequate handling of waste water can cause health problems if it flows into communities by providing breeding grounds for mosquitos. These issues are more common where traditional processing takes place.	Low
Palm oil Processing	**Waste generation**. Solid waste consists of decanter cake, empty fruit bunches, seed shells and fibre from mesocrap. - EFB (Empty Fruit Bunches) are rich in plant nutrients and also improves chemical and physical properties of soil –	Low

	however, they would need to be shredded before application to the soil. - Palm oil mill Effluent (POME) is also produced. POME is a thick brown viscous liquid that is non-toxic but contains soluble materials that may have an impact on the environment. POME is a critical pollutant if released without treatment into rivers and lakes. - Another concern can be the odor from oil palm processing.	
Poultry/pig rearing	**Poor knowledge of biosecurity and disease prevention** – without the information and knowledge for biosecurity practices and farm hygiene will increase the risk of disease agents (e.g. Newcastle and diarrhea) being transmitted to and from farms. A disease outbreak can have bio- and economic consequences. **Inadequate handling/storage/usage of disinfectants** – disinfectants (bought by farmers) are used to avoid pathogen contamination in the animal housing, after first cleaning by removing foreign materials (dust, soil organic matter), use of sunlight and soap and water. Farmers may use phenolic type disinfectants. Personal protection for eyes and hands recommended. Toxicology: eye and skin irritation. Unused material considered hazardous, however, product may be neutralized and flushed with large amounts of water. **Waste generation.** The production of poultry results in hatchery wastes, manure (bird excrement), litter (bedding materials such as sawdust, wood shavings, straw and peanut or rice hulls). The processing of poultry results in additional waste materials, including offal (feathers, entrails and organs of slaughtered birds), processing wastewater and bio-solids. There will be no free ranging of pigs and poultry. - This could raise potential health and environmental concerns as sources of compounds, vectors for insects and vermin and pathogenic micro-organisms. - If not handled properly, this could include degradation of nearby surface and/or groundwater, resulting from increased loading of nutrients such as nitrogen and phosphorus. Environmental pollution occurs when manure or litter is applied to the land in excess of the receiving crop's capacity to utilize the nutrients. Over-applying fertilizer can lead to nitrate leaching into water.	Low Low Low
Boreholes (water wells)	**Excessive water abstraction** –water consumption greater than yield. More than one borehole abstracting water from the same groundwater source is possible. **Water Quality**: unknown pollutants leaching into groundwater is possible.	low

Component 4: Minimal anticipated impact

Minimal impact could be anticipated in the development of mangrove regeneration and sustainable woodlot sites.

Activity	Risks	Likelihood
Mangrove regeneration & firewood woodlots	Exposure to erosion during preparation of land for nurseries/regeneration sites.	Minimal
	Introduction of invasive tree species	Minimal

	Use of water/fertilizers	Minimal

Component 5: No anticipated impact

13. **Mitigation measures**: Describe measures that will be taken to mitigate negative impacts.

General: Before the start of project implementation, the project will do a more extensive environmental and social impact assessment as part of its baseline study. This should further inform and refine the environmental and social safeguarding plan through:

- A field verification/site reconnaissance visit to assess any relevant environmental concerns and conditions on production/processing sites;
- Identification of sensitive components of the existing environment and project activities;
- Appraisal of the project activities and assessment of any negative and positive impacts on the environment through Focus Group Discussion and Key Informant Interviews;

The methodology will further be influenced by international and Nigerian standards and best practices and CEPF guidelines.

Activity-specific mitigation and other safeguarding measures:

Livelihoods Activity	**Risks**	**Mitigation/safeguarding measures**
Fish ponds	**Introduction of exotic species** into the freshwater environment.	Fish species selected for the project will be catfish, a species already found in the Cross River State mangrove freshwater sites and therefore does not constitute a risk of introducing exotic species. Catfish is a main staple, and the fish species primarily consumed in the area, with consistently high market demand. Catfish production is also relatively easy, low-risk and low-cost as compared to other species. Hence, the communities supported with fish ponds will have little incentive to start introducing new species. Nevertheless, to further mitigate the risk of introduction of exotic species into the fish ponds, the following actions will be taken: 1. All community stakeholders and households involved in managing the fish ponds will be sensitized and educated on the risk of introducing exotic species; 2. All members of fishing cooperative develop and sign an agreement/ conditions for managing the fish ponds. This will include a prohibition on the introduction of any other type of fish than catfish locally found;

		3. The agreement/conditions will establish sanctions (fines) if any members are found introducing new species. 4. Community leadership (chiefs) will be sensitized and be asked to back enforcement of the rules – this includes sanctioning if exotic species are introduced after the project ends. 5. There will be regular follow-up visits by the project team to check fish stocks and compliance with the environmental safeguards. Additional measures: Integrated fish farming will be promoted. This means integrated management and comprehensive use of aquaculture, agriculture and livestock. Organic waste will be used to fertilize fish ponds, while small vegetable gardens around the fish pond sites will be encouraged. A site assessment will assess risk of flooding etc. However, there is no significant risk to the environment.
Cassava Processing	**Waste generation.** Cassava processing (into Gari) generates waste in the form of peels, fibrous materials, liquor and waste water. *The solid waste* in cassava processing comprises the cassava peels, fibrous material and chaff. The *liquid waste* is composed mainly of the liquor pressed out of the pulp and that obtained after washing the peeled roots. - Often, this is drained away into the bush or communities. This can change aquatic ecology and affect plant, animal and human health. If the wastewater is used for irrigation, cyanide concentrations can have a negative impact on plant growth and development. - Finally, inadequate handling of waste water can cause health problems if it flows into communities by providing breeding grounds for mosquitos. These issues are more common where traditional processing takes place.	Cassava processing sites will be located at least 100 meters from any water sources to avoid contamination. Solid waste management will be processed through integrated farming as much as possible. Peels will be fed to ruminants. Furthermore, fibrous waste can be dried and used for the production of cassava flour. Chaff consists of the very fine material obtained after sieving the pulp. This material is finer than the fibrous material used in preparing cassava flour. This can be promoted as a by-product, in particular as a poultry feed. Any excess solid waste will be disposed in a cesspit, where they decompose over time. Communities will be trained on proper disposal and use of the cesspit as part of initial and technical follow-up support training.
Palm oil Processing	**Waste generation**. Solid waste consists of decanter cake, empty fruit bunches, seed shells and fiber from mesocrap.	No new palm plantations will be supported; support will be targeted at improved processing only. Nevertheless,

	- EFB (Empty Fruit Bunches) are rich in plant nutrients and also improves chemical and physical properties of soil – however, they would need to be shredded before application to the soil. - Palm oil mill Effluent (POME) is also produced. - Another concern can be the odor from oil palm processing.	within the Cross River State ecosystem palm oil will not displace mangrove forest as it oil palms do not grow well in the saline transitional waters favored by mangrove forest species. Palm kernel waste will be recycled to be used as firewood source, for pig feed or to check soil erosion. The fiber recovered from the nut/fiber separation is a good combustible material and finds uses as boiler fuels. The location of the processing site will be important to avoid odor. A cesspit will be used to channel effluents and avoid any form of environmental degradation.
Poultry/pig rearing	**Poor knowledge of biosecurity and disease prevention** **Inadequate handling/storage/usage of disinfectants** **Waste generation.** The production of poultry results in hatchery wastes, manure (bird excrement), litter (bedding materials such as sawdust, wood shavings, straw and peanut or rice hulls). The processing of poultry results in additional waste materials, including offal (feathers, entrails and organs of slaughtered birds), processing wastewater and bio-solids. - This could raise potential health and environmental concerns as sources of compounds, vectors for insects and vermin and pathogenic micro-organisms. - If not handled properly, this could include degradation of nearby surface and/or groundwater, resulting from increased loading of nutrients such as nitrogen and phosphorus. - Environmental pollution occurs when manure or litter is applied to the land in excess of the receiving crop's capacity to utilize the nutrients.	For animal rearing activities, only sites with low proximity and sensitivity to environmental impacts will be selected. In practice, this means production sites will be located upland, rather than in close proximity to freshwater. Animal rearing will be intensive and closed-system, no free range. Waste will be collected and recycled as manure for farming – this is already done by women in the communities, and considered an added advantage of pig rearing. This provides an additional incentive that will minimize the risk of contamination. Only environmentally friendly construction materials will be used. Integrated farming/waste management techniques will be promoted. This will have a knock-on effect on other farms as well. Most animal rearing products can provide organic and inorganic nutrients that are of value if managed and recycled properly. Most poultry manure and litter can be applied to farms – farmers will be sensitized on appropriate application as pig and especially poultry manure is highly concentrated. Appropriate training using elements of the Farmer Field Schools approach will

		prevent and reduce incidence of parasites to the minimum.
Borehole (water wells)	**Excessive water abstraction** –water consumption greater than yield. More than one borehole abstracting water from the same groundwater source is possible. **Water Quality**: unknown pollutants leaching into groundwater is possible.	The annual rainfall is high (is as much as 7,000 mm), and groundwater replenishment good. The borehole will not be used for commercial large-scale agriculture. As much as practically possible any increased sharing of same groundwater/aquifer will be minimised. Biological and chemical water sampling for laboratory quality assurance testing.

Component 4

Activity	Risks	Mitigation/Safeguarding measures
Mangrove regeneration & firewood woodlots	Loss of access to land – especially for vulnerable populations (e.g. IDPs).	Specific consultations may be decided upon at baseline stage to ensure there is no loss of access as a result of discrimination against vulnerable populations (especially IDP's); Please refer to section 15 for more details. (permission from landowner**)**
	Exposure to erosion during preparation of land for nurseries/regeneration sites.	Only already degraded sites will be selected. These are already cleared, or have only Nypa palms, which on itself does not prevent erosion. There will be very minimal exposure of the soil to erosion through digging of planting holes and filling of nursery bags with soil.
	Introduction of invasive tree species	Only indigenous fast growing plant species will be selected for planting, therefore there will be no risk of invasive species introduction.
	Use of Fertilizers	Only composting with grass and humus soil, no chemicals. Usually, mangroves can restore naturally through their propagules if stress factors are not present. In the case of the areas in question, several stress factors exist requiring therefore that we raise nurseries of mangrove for transplanting as seedlings. There is a higher rate of survival of seedlings compared to other forms.

1 **Actions to ensure health and safety**: Describe actions that will be taken to ensure the health and safety of workers as well as the site. Include a description of waste management and/or disposal.

Waste management details are found above. Health and safety measures are described into detail in the Health and Safety Safeguarding plan for the project.

2 **Monitoring and Evaluation**: This section aims to outline what steps the proponent will take to monitor and evaluate the impact of the proposed intervention.

Environmental (waste) management and safeguarding will be included in all trainings and installation/construction of equipment.

The baseline environmental and social impact will result in a full environmental and social management plan. The NGOCE Livelihoods and Forest Officers will report on a monthly basis on relevant indicators developed as part of the monthly progress report.
This is likely to include indicators on:

- Application of integrated farming/aquaculture/forest techniques;
- Application of appropriate waste management/disposal techniques;
- Application of appropriate storage and application of disinfectants;
- Adherence to Health and Safety Protocols.

The NGOCE Officers will conduct bi-monthly follow-up visits and will be required to document and report any issues of environmental and social concern to determine follow-up actions. This will be an additional safeguard in addition to community safeguarding protocols. Furthermore, a risk audit/assessment will be done every 6 months.

15. **Permission of the landowner**: Please verify permission of the landowner to undertake actions on the site, and verify that you have the required permits to undertake this work.

Land needs to be made available by the community for production and/or processing and equipment, as well as for nursery and woodlot development. The project ensures it has full permission by:

- Extensively researching the local land use system through consultations with Traditional and Community Leaders;
- Specific consultations may be decided upon at baseline stage to ensure there is no loss of access as a result of discrimination against vulnerable populations (especially IDP's);
- Only lands that have clear land title and customary rights, and that are approved by the local authority and community leaders are selected;
- The project will establish a transparent and fair system for resolving conflicts and grievances based on local structure;
- The project will enter into a formal agreement with families with any claims to the sites selected (if necessary).

3 **Consultation**: This section aims to outline the range of informed consultations that the grantee has had both with experts to optimize the potential for success, and with stakeholders, particularly local communities, who are potentially affected by the proposed actions. Include dates of consultations.

The design of the IMFOMALN project is an outcome of an ongoing process and discussions between stakeholders. While the first stage UN-REDD+ programme followed the IMFORM project in the mangrove areas, the second stage of REDD+ only targets tropical rainforest areas in Cross River State. This has left a gap in engagement in mangrove areas that stakeholders have been planning to fill. Hence, the IMFOMALN project is much anticipated by stakeholders including communities, CBO/NGO's, government players and other development partners and should be considered part of a larger, long-running programme to support mangrove conservation and livelihoods.

Local partner NGOCE has been engaged throughout the proposal development phase, and contributed their insights based on years of experience working in mangrove forest areas. NGOCE's mission is to facilitate the sustainable development of the environment through awareness creation, advocacy and capacity building of members to carry out intervention programs and projects. Their current and past activities encompass environmental education, organizational capacity building (of members), research on environmental issues, community development and sustainable resource management, and policy and advocacy. Therefore, the scope and objectives of the IMFOMALN project closely reflect the vision, mission and objectives of the organization. The full organizational profile can be found as an attachment.

NGOCE, as credible local partner in environmental management programmes in Cross River State, will be the sub-grantee on the project, following procedures described in UP Nigeria's Partnership and Sub-Grantee Manual. United Purpose will provide continuous hands-on capacity building support in line with its approach to working in partnership with local organizations (more details can be found in the UP Nigeria Partnership and Sub-Grantee Manual). Support will be based on a combination of self-assessment with collaborative needs assessment. Consideration of both perspectives enables for identification of capacity gaps, and offering the best possible support. Mentoring, specific refresher trainings and continuous hands-on support further contribute to a process of capacity building in all areas – including facilitation, M&E, and financial and administrative management.

Representatives from Mangrove Action Watch have been consulted on the development of the project. They have a history of engagement with UP and NGOCE, as MAW was formed during and is a legacy of the IMFORM project. Mangrove Action Watch has seven key objectives: grassroot advocacy for mangrove conservation; awareness creation on mangrove conservation; capacity building (especially of women and youth) in sustainable use of mangrove resources; facilitating participatory community development through conservation; supporting conservation through school clubs; participatory sourcing of funds; facilitating community engagement meetings on conservation. The IMFOMALN project will directly support MAW to carry out their objectives. They have been engaged on the project components – including organizational capacity building proposed as part of this process. Continued support would be much welcomed by the organization, both in terms of short-term support to realization of their objectives, as longer-term strategic support aimed at organizational development and independence. MAW's engagement as stakeholder and first point of contact between the project and communities has already started, as they mobilized communities for (and attended) the stakeholder meeting organized at UP's office on 20th March.

The Director of the Forestry Commission and of the Ministry of Agriculture have attended the stakeholder meeting in UP's office on 20th March. They are aware of and support the goals of the project and their role in implementation as stakeholders. The Forestry Commission in particular welcomes the intervention, as it directly supports their mandate in participatory forest management in line with the Forestry Law.

Chiefs and other representatives from the 15 selected communities attended the stakeholder meeting in UP's office on 20th March. On a separate follow-up visit, a representative on behalf of UP/NGOCE

together with the chairperson of MAW visited all communities. This provided opportunity for traditional and community leaders, including those not attending the stakeholder engagement meeting. As a result, all communities have been engaged, including key constituent groups of chiefs, women leaders and youth leaders. They have subsequently delivered their support letters and provided additional input and asked questions for further clarification on the timeline and scope of the project.

All stakeholders were provided with UP contact details and an open invitation for further discussions and input. To date, all feedback has been positive, with chiefs and communities welcoming the project and demonstrating interest in and commitment to the project.

4 **Disclosure**: CEPF requires that safeguard documents are disclosed to affected local communities and stakeholders prior to project implementation. Please describe efforts to disclose this impact assessment and environmental management plan and provide dates.

The project will disclose and explain the initial environmental and social assessment during the inception meetings (July 2018). This will provide an opportunity for the community to provide further input for the full assessment and express any concerns that may not have been considered.

Following full assessment as part of the baseline study, the environment and social plan will be communicated during the first training and/or installation of equipment in each community. Community chief, women leader and youth leader will be provided a copy of the plan. The NGOCE Livelihood Officer and UP Project officer will translate and explain the plan in Pidgin English or local language, as literacy may be a challenge.

18. **Grievance mechanism**: All projects that trigger a safeguard must provide local communities and other relevant stakeholders with a means to raise a grievance with the grantee, the relevant Regional Implementation Team, the CEPF Secretariat or the World Bank.

- Chiefs and women and youth leaders of each community will be provided a copy of the Environmental and Social Management plan and Health and Safety Plan, including details of the grievance mechanism;
- Posters will be produced including details of the grievance mechanism. These posters will be disseminated and affixed in strategic locations (i.e. at production/processing sites). Details and procedures of the grievance mechanism will be explained in Pidgin English and/or local languages during training and installation/construction activities.
- During bi-monthly follow-up meetings the NGOCE Livelihoods Officer will regularly remind the community of the grievance mechanism.

The poster will include the following information:

- Email and telephone contact information for your organization – Project Manager Tel: +234 802 413 9455, Email nigeria@united-purpose.org
- Email and telephone contact information for the CEPF Regional Implementation Team.
- Email and telephone contact information for the local World Bank office.
- The email of the CEPF Executive Director: cepfexecutive@conservation.org

Should we receive any grievance, we will share all of them – and a proposed response – with the Regional Implementation Team and the CEPF Grant Director within 15 days. If the claimant is not satisfied following the response, they may submit the grievance directly to the CEPF Executive Director at cepfexecutive@conservation.org or by surface mail. If the claimant is not satisfied with

the response from the CEPF Executive Director, they may submit the grievance to the World Bank at the local World Bank office.