



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 01/12/2023 | Report No: ESRSC03248



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Philippines	EAST ASIA AND PACIFIC	P180320	
Project Name	Bangsamoro Camps Transformation Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social Sustainability and Inclusion	Investment Project Financing		2/23/2023
Borrower(s)	Implementing Agency(ies)		
Community and Family Services International Inc.	Bangsamoro Development Agency, Community and Family Services International		

Proposed Development Objective

The proposed project development objectives is to improve access to socio-economic services and infrastructure.

This project is fully aligned with the main objective of the BNTP, which is to assist in the development of these camps, with the aim of transforming these areas into peaceful and productive communities.

Financing (in USD Million)

Amount

Total Project Cost	4.00
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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]

This proposed project will support the following two broad focus areas:

1. Supporting agricultural livelihoods and productivity through the provision of agricultural inputs, as well as the provision of extension services and other capacity-building support.



2. The provision of basic services and socio-economic infrastructure focusing on those supporting agricultural livelihoods.

To ensure that interventions address local priorities and to strengthen community ownership and cohesion, the project will include a strong Community Driven Development (CDD) approach, to enable communities to participate in the prioritization of interventions at the local level.

The implementing partner will carefully design and implement such a CDD approach, for which activities will include community organizing and mobilization, community dialogue, linkage and networking, and capacity development for citizens and local leaders. It will also take into consideration how vulnerable, minority or marginalized groups, such as women, youth and indigenous people, can participate in the decision-making process.

The Joint Task Forces on Camps Transformation (JTFACT) has identified a target area for project implementation of 30 areas (Barangays or Municipalities) within the core of the six previous-acknowledged MILF camps, based on the Camps Transformation Plan. Project beneficiaries will include MILF - BIAF members, women, youth, indigenous people and other vulnerable or minority groups.

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 JTFACT in 2020 conducted a needs assessment and community-level planning dialogue that informed the CTP. The CTP sets out the integrated program of social and physical infrastructure development and generation of economic opportunities for decommissioned MILF combatants and communities to transform the six acknowledged MILF camps composed of clusters of widely-spread, long-standing, permanent rural communities that host active and former combatants. and are not typical military camps. These are Camp Abubakar as-Siddique in Maguindanao, Camp Bushra Somiorang in Lanao del Sur, Camp Rajamuda in North Cotabato, Camp Badre in Maguindanao, Camp Bilal bin Rabbah Darul Shuhadah in Lanao del Norte and Camp Omar ibn al-Khattab in Maguindanao. The JTFACT has identified 33 priority barangays under the camps in the provinces of Maguindanao del Norte and del Sur, Lanao del Sur and del Norte, and North Cotabato. The distance between each camp range from 115 to 260 kilometers, Lanao del Norte in the north and Maguindanao del Sur in the south. Many of the target areas are inundated most of the year, with only limited arable land left to till. Declared protected areas are 5-30 km. away from the camps, as follows: 1) Camp Abubakar: Bulubudtua Falls, 2) Camps Badre and Omar: Liguasan Marsh, 3) Camp Bilal - none 4) Camp Bushra - Lanao Lake, 5) Camp Rajamuda - Rio Grande de Mindanao. The ecosystem services provided by these areas are 1) provisioning - food, water, and biodiversity 2) regulating - flood control, pollution control, 3) cultural - cultural identity, heritage, religion, and recreation. Freshwater lakes, rivers and springs are their sources for drinking and agriculture, with most of the surface waters flowing through populated areas being silted and polluted with domestic liquid and solid wastes.

The community's demographics vary depending on the location. Based on RDP2 and 3, the majority of these communities are homogenously Maguindanao Muslims (ethnolinguistic classification), with a minority of IP groups in Maguindanao, and some "settler" families (from Luzon, Visayas, outside BARMM, Christians). Social structures and



decision-making in these communities tend to be more patriarchal and deference to senior-aged male members of the communities and local commanders and politicians. Challenges in meaningful participation of women, young people, and IPs are present, including the competing interest between informal and formal local power brokers. Due to the communities' location, proximity, and affiliation (to some degree) with the MILF and other situations of conflict, all of these areas are categorized as conflict-affected areas. However, most have recently experienced relative peace and stability as a product of the peace process between the Government of the Philippines (GPH) and MILF.

The nexus between conflict and natural disaster have become clearer, especially in the BARMM and its peripheral provinces such as North Cotabato. Examples of this include the long (2015 to 2016) "El Nino" phenomenon in North Cotabato and Maguindanao that, according to FAO's 2017 update, resulted in 1.48 million metric tonnes of crop loss, affecting 413,456 farming households. Farmers from North Cotabato staged a hunger strike and protest; violence ensued when state security forces dispersed the group, which resulted in 3 deaths, 116 people injured, and 88 missing. More recently, in Maguindanao, the heavy rainfall caused by typhoon Paeng (Nalgae) resulted in flash floods affecting several towns in Maguindanao, affecting 557,000 individuals, with 61 deaths. This includes a washed-out IP relocation center for internally displaced IP families affected by land conflicts in Dato Odin Sinsuat Maguindanao. Noting this increasing vulnerability to climate change and disaster, the project will integrate elements of climate change adaptation and disaster risk mitigation and management in its design and strategies.

D. 2. Borrower's Institutional Capacity

Community and Family Services International (CFSI) will be the primary grant recipient and legal implementing agency of the project, with the Bangsamoro Development Agency (BDA) supporting the implementation of the Bangsamoro Camps Transformation Project (BCTP). CFSI is an international, non-profit, humanitarian organization committed to peace and social development registered with the Securities and Exchange Commission (SEC) of the Philippines as a not-for-profit, nongovernmental organization; licensed and accredited by the Philippine Government's Department of Social Welfare and Development (DSWD); and certified at the highest level by the Philippine Council for NGO Certification (PCNC). Since the start of the Mindanao Trust Fund (MTF) in 2005, CFSI has delivered critical services as a grant recipient. For the implementation of activities in the 6 acknowledged MILF Camps under Reconstruction and Development Project phase II and III, CFSI was identified by the MILF leadership to be the project implementation unit (PIU) for the project. Given the sensitivity surrounding the entry of institutions and organizations in the camps of the MILF, the leadership of the MILF was wary of allowing any organization to enter their territories. CFSI was seen as a trusted partner to take on the role of the implementer.

CFSI has significant capacity and a proven track record in managing funds and delivering results. CFSI has experience with World Bank fiduciary requirements as well as the Environmental and Social Framework. With 614 staff, CFSI operations in Mindanao are carried out in the CFSI Operations Center in Cotabato City (2000), three Sub-Offices – in Iligan City (2009), Zamboanga City (established in 2013), and Surigao City (2021) – and a Field Office in Marawi City (2009). Oversight and support activities in Mindanao are provided by CFSI Headquarters, Pasay City, Metro Manila. As the implementing agency of MTF RDP1,2,3, CFSI has satisfactorily implemented environment and social safeguards instruments, demonstrating satisfactory safeguards performance.

BDA was created in June 2002, following the June 2001 GPH-MILF Tripoli Agreement on Peace, the BDA is the development arm of the MILF; primarily tasked to determine, lead and manage relief, rehabilitation, and development in the conflict-affected areas in the Mindanao. BDA has been involved in MTF-funded activities since



2005 as an implementing partner of CFSI, and has benefited from extensive capacity-building over more than a decade. In late November 2019, BDA registered as a non-profit, non-stock corporation with the Securities and Exchange Commission (SEC) of the Philippines as the Bangsamoro Development Agency, Inc. (BDA, Inc.) but does not yet have certification of tax-exempt status as an NGO, with the aim of playing a greater role in the future of the Bangsamoro. BDA has a staff contingency of 33 staff of which 21 are project staff, and the remainder supports administration.

Since BDA, and its experience in managing financial management and procurement is limited to smaller technical assistance-type activities, it is proposed that BDA will support the implementation of the BCTP as an implementing partner under CFSI. The exact implementation set-up will be developed in collaboration with CFSI, BDA, and the World Bank to ensure that BDA takes responsibility for certain parts of project implementation and fund management. This allows BDA to build its capacity and establish more of a track record for future projects, while at the same time working on its tax exemption status. In the aspect of environmental and social safeguard activities, CFSI will be the lead while providing opportunities for BDA to meaningfully participate in the assessment, development, management, and tracking of ESS-related tools and activities. Overall, CFSI will be the grant recipient and lead implementing agency for this project.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Moderate

The Project will screen subprojects based on Selection Criteria which will exclude sites that are located in Environmentally Critical Areas declared under the Philippine EIA law such as forests and protected areas designated as strict protection zones, biodiversity conservation areas, national parks, and critical natural habitats as well as danger zones that are affected by typhoons, floods, earthquakes, landslides and the like. The potential impacts that will be generated from the small works are expected to be site-specific, temporary, and manageable. The anticipated impacts are noise, dust, uncollected and undisposed construction debris and related solid wastes, water, air, and soil pollution due to the debris, occupational health, and safety of workers, community health and safety, including covid-19 and other infectious disease risk management. The potential risks and impacts are expected to be site-specific and do not extend to any sensitive environmental areas, and are temporary in nature, which could be either minimized or mitigated with existing environmental risk management arrangements in the project areas under MTF RDPs. The Environmental and Social Management Framework (ESMF) adopted under the MTF RDPs provides an effective process to screen the proposed activities based on selection criteria which will exclude sites that are located in Environmentally Critical Areas declared under the Philippine EIA law such as forests and protected areas designated as strict protection zones, biodiversity conservation areas, national parks, and critical natural habitats as well as disaster-prone areas that are frequented by typhoons, floods, earthquakes, landslides addresses such impacts. Further, given CFSI's proven track record and institutional capacity to manage the project, including ensuring that the project activities are compliant with the ESF, the expected low to moderate environmental risks could be managed effectively. Since the project will finance limited investments and small civil works within the premises of the priority target areas located in isolated and remote villages, it is deemed sufficient that the minimal risks and impacts can be adequately addressed through a framework approach to address the temporary and low-level impacts. In this regard,



CFSI will update the Environmental and Social Management Framework (ESMF) adopted under the MTF RDPs and prepare the necessary safeguards instruments, considering the Bank's ESF requirements, prior to commissioning the Trust Funds. Given the above considerations, the Environmental Risk Rating is deemed moderate.

Social Risk Rating

Moderate

Communities served by this project are situated across the six acknowledged camps of the MILF and are considered conflict-affected areas presenting a complex contextual risk. Despite this, the social rating is still considered to be Moderate as the activities are small-scale, community-based and driven, and will not involve the use of heavy equipment or influx of migrant labor into communities. While there are still limited risks that small-scale construction activities could use trafficked/forced or child labor, as well as potential OHS violations and trafficking. These practices are strictly prohibited under national law and have not been observed in Bank financed operations at a similar scale, in similar locations, in the past. Enforcement mechanisms includes the the Ministry of Labor's OHS unit, the Joint Task Force on Camps Transformation Camp Coordinators, and the Barangay-level anti-human trafficking mechanisms. Relevant laws and policies addressing these also exist, such as RA 9231 or the Special Protection for Children Against the Worst Forms of Child Labor, Presidential Decree No. 442 or the labor code of the Philippines, and RA 11862 or the Expanded Anti-Trafficking in Persons Act. Competing interests in identifying priorities and selecting beneficiaries may lead to social tensions/frictions. This risk is particularly important to note as it may spill over to become potential drivers of violent conflicts in the area. According to International Alert's Conflict Alert 2021 report, while vertical-level conflicts have subsided, there is an increasing trend and intensity of horizontal-level violent conflicts such as "rido" or clan feuds fuelled by the inter-causal factors of politics, family honor, land, and resource disputes. In addition, elements of extremist groups are also present and active in the areas around Lanao del Sur and in the two Camps located in Maguindanao (i.e., Omar and Badre). The inter-generational and overlapping conflicts in Mindanao are fuelled by several interrelated issues, including socio-economic inequalities (e.g. high poverty incidence, low human development), access to land and resources, and systemic marginalization. In order to mitigate this, the project will continue to use elements of community-driven development- a tried and tested strategy during the MTF projects. A solid stakeholders engagement plan and GRM will also be required of the project laying out specific steps and strategies that will enable meaningful participation, especially from the marginalized sectors in the community. Camps Badre and Omar have IP communities whose interests could be undermined being a minority in the area. As an affirmative action, the BCTP will provide a separate/dedicated allocation for community sub-projects for the IP group. Although not as critical as before, the threat of COVID-19 still persists. Communities in BARMM however have become more adapted and resilient. As of November 13, 2022, according to the BARMM COVID-19 Inter-Agency Task Force report, the region has posted zero new cases of COVID, with 150 active cases. The project's potential and relevance to contributing to peace and development opportunities in these areas is very high. The project is also aware of these risks, as implementing partners and the Bank have longstanding experience in working in the Camps. It will work with the relevant peace process mechanisms and actors to navigate the dynamic and volatile peace and security situation on the ground. These include maximizing the presence of joint peace process mechanisms such as the Coordination Committee for the Cessation of Hostilities (CCCH), Joint Normalization Committee (JNC), and Joint Task Force on Camps Transformation (JTFACT), among others. The project will also utilize the Bank's Mindanao Peace Lens as an approach to conflict sensitivity and peacebuilding strategies.

Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Risk Rating

Moderate

Although the project is implemented in conflict-affected areas, the risk of SEA/SH for this project is Moderate as the project will not involve the mobilization of a large workforce, especially from outside the community. The project will encourage implementing contractors to source their laborers within the community or adjacent areas. In addition, the



project's activities will not require beneficiaries to travel long distances or attend overnight training or capacity development activities outside their communities. Several local government mechanisms and regulatory frameworks will also be tapped by the project to mitigate SEA/SH, including the mandated Barangay Child Protection Committee (BCPC), Gender and Development (GAD) committee, and the dedicated women and child desk officers of the Philippine National Police. The project will require the project implementers to include PSEA/SH guidelines and commitments in the contracts of its sub-contractors who will be implementing construction works and provision of services or goods in the community. This will include PSEA/SH training and orientation to implementing partners' staff, community conduits, and community members. The GRM will also capture SEA/SH, including case management and referral pathways for survivors.

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

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

Relevant.

The project will be financing the construction of small socio-economic infrastructure (SEI), such as water systems, access roads, and post-harvest facilities, combined with equipment, training, and/or other forms of technical assistance related to enhanced production, construction of Community-Based Infrastructure (CBI) in the camps, such as hand-washing stations in strategic locations, properly furnished and equipped health centers or health stations, and possibly even isolation facilities. Because the infrastructure to be constructed is small scale, it is expected that the impacts may consist of dust, noise, construction debris, shallow trenches, and roadblocks that are temporary and reversible. The risks and impacts that need to be managed are those that could be generated during the construction works which may include soil movement due to land clearing, earthworks, compaction, filling of low-lying areas, soil overburden, undisposed construction debris, inadequate collection and treatment of domestic liquid and solid wastes and special wastes such as healthcare wastes. During its sourcing, distribution, and operation, the operators of potable water supply systems have to ensure the sustainable management of the water resources and have to satisfactorily meet the National drinking water standards at all times. As prescribed in the ESMF, the contractors for the construction of the small works as well as other activities funded by the project will have to comply with the government's strict healthcare protocol required by the Department of Public Works and Highways, Department of Health, and the LGUs. Compliance includes adequate training on the proper covid-19 and other infectious diseases and the management of healthcare wastes.

A risk assessment matrix is being prepared to coincide with the Environment and Social Assessment (ESA) in the Environmental and Social Management Framework (ESMF). Risk management and mitigation measures to address the potential environmental and social impacts will be included in the sub-projects ESMP. An Environment and Social Commitment Plan (ESCP), Stakeholder Engagement Plan (SEP), Labor Management Plan (LMP), and a Grievance Redress Mechanism (GRM), are being prepared. Public consultations were undertaken and will be continued during the life of the project as guided by the ESMF when needed. The subprojects will implement an Environment and Social Management Plan (ESMP) which will be described in the ESMF and implemented by the BDA at the subproject level.

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



Not relevant. The ESF will be used for all relevant environmental and social risks and impacts. The project will apply relevant national laws and policies as required, but will not rely on the Borrower's framework.

ESS10 Stakeholder Engagement and Information Disclosure

The project will involve broad-based participation of key stakeholders across all levels and affiliations; GPH peace process mechanisms, regional, municipal and barangay-level officials, MILF and community members, with special attention to the inclusion of women, persons with disability/ies, youth, senior citizens, and IP groups. More importantly, consultations with IPs is a key characteristic of the project and IP would be included as core design of the project.

A Stakeholders Engagement Plan (SEP) will be prepared for this purpose. The SEP will identify primary stakeholders that include the project-affected groups/stakeholders that either benefit from or be adversely affected. The SEP will also outline action points involving individuals or groups involved in implementing the various project deliverables across all stages. In addition, the SEP will also identify interested parties/stakeholders who will have significant influence over the project and its intended results or would be indirectly impacted by the project or its outcome. Further, the appropriate method, agenda, and frequency for engaging the different stakeholders will be designed to mitigate negative influence and/or harness their positive influence over the project or their specific participation/role in the project. Lastly, the SEP will include a grievance mechanism. The SEP will be submitted to the Bank and disclosed in time for the appraisal.

Building from the learnings and approach from the Mindanao Trust Fund Reconstruction and Development Projects (MTF RDP), this project will be purposeful in increasing the meaningful participation of marginalized groups, including women, children and young people, persons with disabilities, and Indigenous Peoples (IP) in any community-level decision-making process. This will include applying culture-sensitive engagement and dissemination processes, analyzing power relations and dynamics among groups that may hinder the participation of some sectors or individuals, and considering local indigenous political structures of IPs in coordination with relevant government offices when engaging with IP communities.

To adjust to the dynamic COVID-19 situation, the project will follow the national and local health protocols and advisories in the conduct of community assemblies and face-to-face interviews or consultations. If in the course of the project public health restrictions would not permit face-to-face consultations, stakeholder engagement would take place in line with the World Bank's Technical Note on "Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings."

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

This standard is relevant. The project will hire direct and contract workers as well as primary supply workers with a potential to tap community members for certain projects such as construction and service delivery. While a no-discrimination policy will be followed during the hiring process, preferential treatment for local laborers will be



encouraged to generate jobs in the area, and lessen the risk emanating from labor influx. The project will ensure that labor practices will be compliant with the general policies and requirements of ESS2 for voluntary, non-harmful or non-hazardous, just compensation/benefits as prescribed by the Labor Code, non-engagement of child labor, government COVID-19 health protocols, and guidance, and other provisions for workers' welfare and protection. A Labor Management Procedure guidelines (LMP) will be prepared to ensure that the labor arrangements for the project would ensure fair, equal and non-discriminatory arrangements as well as appropriate occupational health and safety protocols to including existing COVID-19 pandemic conditions. Given the small nature of the project, the small size of the sub-projects and low number of workers involved from the communities, the LMP will be included as part of the ESMP and Project Operational Manual. The LMP will include four (4) commitment documents in the Work Contracts signed by the contractors, as well as with other project workers – (i) Commitment to Child Protection; (ii) observance to industry standards on occupational health and safety, management and care related to accidents and fatalities, and (iii) Prevention of Sexual Exploitation and Abuse (PSEA), (iv) Project grievance redress mechanism will be designed to capture and be accessible and open for labor-related concerns using the Department of Labor and Employment GRM.

On Covid-19, personal protective equipment (PPEs) will be provided to all community workers when prescribed for by the government and based on the latest COVID-19 alert levels and corresponding protocol. The project will also ensure that all protocols, along with OSH measures, are strictly enforced.

ESS3 Resource Efficiency and Pollution Prevention and Management

Although the proposed activities are not expected to generate significant impacts, it is anticipated that limited air, water, noise pollution, and waste disposal are expected temporarily due to the proposed minor civil works. The project activities are also expected to use limited resources such as sand, soil, quarry material, etc. from the region for minor civil works. In case the activities contribute to the heightened farming in the areas and lead to increased use of fertilizers and pesticides, the ESMF provides for the proper protocol of handling, use, and management of agricultural chemicals and their residuals, which includes compliance with relevant government regulations and guidelines. All such issues would be addressed through the proposed ESMF with relevant provisions to screen the project activities, and take necessary measures such as the exclusion of environmentally sensitive areas to extract resources, observe the diligent use of natural resources during construction, prohibiting illegal activities such as clandestine quarrying, illegal logging as well as illegal dumping of construction debris in low-lying areas are not allowed unless approved by the LGU or the concerned government regulatory agency. Any nuisance or residuals generated during the construction that may cause pollution, or health concerns due to the contamination or environmental degradation as well as land reclamation of floodplains, and coastal and riverine areas or restricted access to households or places of work or livelihood would be addressed through standard environmental codes of practice for minimizing and mitigating impacts, and carry out detailed assessments if necessary. Activities that will require the project to secure government permits or comply with national laws and local ordinances will be strictly followed. Given the small scale and modest nature of the project investments, no significant GHG emissions are expected and GHG assessment is not needed.



ESS4 Community Health and Safety

While the community health and safety risks for this project are expected to be small in magnitude, site-specific and have a low probability of serious adverse effects on human health, adequate protocol on the prevention and management of infectious and communicable diseases such as COVID-19 and sexually transmitted diseases (STDs) will be put in place by the project.

Climate resilience and disaster risk mitigation measures are inherent in the design of the community-based infrastructure as well as the activities that involves public participation to ensure the protection, safety, and security of the communities and secure the project's investments. Climate-smart features and mitigation measures are also required by the government for its projects to make sure that the structures can last during and beyond the lifespan of the infrastructure of at least 15 years and withstand strong winds, typhoons, floods as well as heat waves, drought, and dry spells brought about by extreme weather conditions. The ESMF emphasizes the need to prepare and integrate climate resilience and disaster risk mitigation measures in the project activities.

Since the project will support small civil works, an influx of laborers is not expected, instead, the mobilization of workers from the surrounding area will be the preferred modality, with those coming from outside being limited to skilled workers, including the supervisor, unless there are IPs in the AD who have the required skill. The DA teams and private contractors will be required to observe a code of conduct for workers which would address community health and safety risks, including risks of gender-based violence and child labor; protocols for maintaining road safety in anticipation of increased road traffic due to delivery of supplies for the infrastructure as well as entry of project teams and other stakeholders. While the occurrence of any form of gender-based violence, that is attributable to the Project, is not expected, protocols for early detection of GBV will be developed and a referral mechanism to address such will be defined, using existing indigenous community-based networks for the protection of women and children against violence as prescribed by law. A community health and safety protocol will be adopted as part of the ESMF. A security management plan will also be prepared as part of the ESMF to be discussed between CFSI, BDA, and partner agencies. Road safety and traffic management plan will also be described in the ESMF and will be prepared and included in the ESMP.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

This standard is relevant. As no involuntary and resettlement/displacement will be foreseen, the project will not require a Resettlement Action Plan (RAP). Voluntary land donations was applied in RDP 2 and 3 projects, whose experience showed a positive impact on the communities and, most importantly, the owner who also benefited from the project/s. This project shall follow the same strategy and practice. However, land criteria, processes and documentations related to voluntary donation of lands shall be reflected in the ESMP and POM. For projects that will use private lands, protocols for voluntary donations will be required in accordance with the protocols for voluntary land donation (VLD) as part of the ESMF. The existing VLD protocols will ensure that the owners are properly informed- that donation is an option and that they can refuse to allow the use of their land, such donation is done voluntarily and without coercion or under duress. Moreover, that such land to be used for the project are unoccupied and is not being used for any economic activities nor does it have productive assets.



Finally, the project, as part of promoting the use of the peace lens, the implementing agency together with local leaders and the donor shall ensure that donated lands have undergone the due diligence process, including ensuring that the donated land is conflict-free and is a neutral place for all community members to access.

Land classification in BARMM is composed of alienable and disposable lands (including residential, agricultural, commercial, and industrial), timberland, protected parks, and mineral and those applied for as ancestral domains. Land property rights and ownership in the region also vary, including ownership through privately titled lands and or tax declarations from transfer through sale, inheritance, or awarded from the government. Majority of land ownership, however, are undocumented. The BARMM government reported that based on the 2015 cadastral survey and report, a total of 208,583 hectares of cadastral lands were contested in the region. Noting these multiple land issues, the project will categorize as part of the negative list of those activities that will entail involuntary land acquisition and resettlement (displacement).

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The anticipated impacts on the Biodiversity and Living Natural Resources may occur if the project activities in the campsites are inside declared forests and protected areas. The anticipated impacts are expected to be localized and manageable, still, caution has to be observed in the different campsites as they would most likely be characterized by different landscapes, aquatic features, or environmental conditions that necessitate a targeted set of mitigation measures. The proposed ESMF would include relevant screening mechanisms to ensure that the ecologically sensitive sites will be avoided and the proposed environmental management measures will protect bio-diversity areas from localized impacts.

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

Camps Badre and Omar, situated in the provinces of Maguindanao del Sur and Norte, host non-Moro IP communities belonging mostly to the Teduray, Lambangian and Dulangan Manobo tribes. The promotion and protection of these IPs' identities, existence, and rights are well entrenched in RA 11054 or the Organic law for the BARMM. The project will include as part of its negative list, any activity that will have an adverse impact on land, natural resources and cultural heritage of IPs communities. For this project, there is no anticipated adverse impact on the land and natural resources, cultural heritage, and any IP relocation, and therefore it will not be necessary to follow a process of Free, Prior and Informed Consent for project activities.

As part of the project's affirmative action, it will provide a specific grant allocation for activities/sub-projects for IP communities; such activities shall be identified and designed through a participatory process in accordance with IP customary practices. As such, the project will not require a stand-alone Indigenous People's Participation Framework (IPPF); instead, guidelines will be included in the ESMF and POM to ensure strategies and approaches to enable an IP-friendly, inclusive and broad-based participation of the IPs in the projects. These guidelines shall be take into account the requirements of ESS7.

In addition, the project will implement a participatory process that would involve continuous dialogue and seeking consent at the pre-entry stage to ensure the acceptability of the project, formalized through an IP council resolution.



The implementation stage will also be a highly participatory process involving IP organizations in identifying, designing, and implementing their proposed activities/sub-projects.

ESS8 Cultural Heritage

As part of the ESMF, the project will map cultural/sacred areas/sites of great importance to the community. It will develop protocols to manage chance-find according to the Chance Finds Procedures in the ESMF, in consultation with the BARMM Ministry. The project must ensure that no infrastructure project will be funded if it will damage cultural property/ies. In cases where socio-economic infrastructures will pass through sites considered cultural properties of the IPs, the project will find an alternative area so that these sites can be preserved and remain intact. Project sites located near/adjacent to cultural heritage sites/sacred sites must ensure that a conservation plan for the heritage/sacred site is made part of the Environmental and Social Management Plan for the specific project activity, and included in the project's Operations and Management Plan and Sustainability plan.

ESS9 Financial Intermediaries

N/A

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No
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OP 7.60 Projects in Disputed Areas	No
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III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered?	No
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Financing Partners

N/A

B. Proposed Measures, Actions and Timing (Borrower's commitments)

Actions to be completed prior to Bank Board Approval:

None

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

The ESCP may not reflect the detailed commitments in consonance with all E&S instruments as well as the lack of capacity and commitment to implement them. The E & S instruments are under preparation. The ESCP and SEP will be



finalized prior to the grant signing. The other E & S instruments will be finalized and disclosed within 60 days of grant effectivity.

Establishment and designation of team who will ensure implementation of safeguards commitment; capacity building plan for the RDP/3 safeguards team ;

Monitoring plan for tracking safeguards compliance

Provision of sufficient and appropriate resources to implement the safeguards commitments

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Community and Family Services International Inc.

Implementing Agency(ies)

Implementing Agency: Bangsamoro Development Agency

Implementing Agency: Community and Family Services International

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s): Ditte Marie Gammelgaard Fallesen