



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

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The World Bank

FCPF CAPACITY BUILDING ON REDD+ FOR INDIGENOUS PEOPLES, CIVIL SOCIETY AND LOCAL COMMUNITIES IN LAC PROJECT (P175745)

BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Latin America	LATIN AMERICA AND CARIBBEAN	P175745	
Project Name	FCPF CAPACITY BUILDING ON REDD+ FOR INDIGENOUS PEOPLES, CIVIL SOCIETY AND LOCAL COMMUNITIES IN LAC PROJECT		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social Sustainability & Inclusion	Investment Project Financing		5/14/2021
Borrower(s)	Implementing Agency(ies)		
Asociación Sotz'il, Asociación Coordinadora Indígena y Campesina de Agroforestería Comunitaria de Centroamérica (ACICAFOC)	ACICAFOC, Asociacion Sotz'il		

Proposed Development Objective

The Project Development Objective (PDO) is to strengthen the engagement of targeted forest-dependent peoples and Southern CSOs in REDD+ at the country and regional levels in LAC.

Financing (in USD Million)	Amount
Total Project Cost	1.99

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 Third Phase of the Forest Carbon Partnership Facility (FCPF) Capacity Building Program (CBP) on REDD+ for forest-dependent indigenous peoples (IPs), Southern Civil Society Organizations (CSOs), and other forest dwellers (OFDs; in the REDD+ context, OFDs are often referred to as local communities, LCs) in the Latin America and Caribbean (LAC) region aims to strengthen the engagement of targeted forest-dependent peoples and Southern CSOs around REDD+ at the country and regional levels. The project will be financed through US\$ 1,990,000 Recipient Executed (RE) grant funding and will be implemented by Asociación Sotz'il, which is based in Guatemala, and Asociación Coordinadora Indígena y Campesina de Agroforestería Comunitaria de Centroamérica (ACICAFOC), which is based in Costa Rica, as a single project, but with two separate Grant Agreements. These same organizations served as implementing organizations (IOs) for Phase 2 of the FCPF CBP in the LAC region, which wrapped up at the end of June 2020. For Phase 3, Asociación Sotz'il will continue to focus on implementing REDD+ capacity building activities among forest-dependent IPs, while ACICAFOC will maintain the same focus on in-country CSOs and local communities.

The FCPF CBP in the LAC region Phase 3 project consists of three components, as follows:

Component 1 will support REDD+ capacity building and awareness raising sub-projects for forest-dependent IPs, civil society, local communities and their representative organizations and networks in FCPF Carbon Fund countries. Eligible organizations in Chile, Costa Rica, the Dominican Republic, Guatemala will be able to obtain sub-grants to undertake awareness raising activities on REDD+ in general, and on environmental and social sustainability issues in jurisdictional Emission Reductions Programs (ER-Ps) in those countries in particular. The project will make a concerted effort to include women, youth and Afro-descendants as beneficiaries of activities under Component 1. It will also cover identification and production of studies, analytical reports and learning materials to inform the aforementioned knowledge and awareness raising activities, including among other things: (i) incorporation of the traditional knowledge of forest-dependent indigenous peoples and other forest dwellers into ER-Ps; (ii) operationalization of effective and transparent Benefits Sharing Plans (BSPs); (iii) engagement of women and Afro-descendants in the conservation and sustainable management of forests; and (iv) linkages between livelihoods support efforts and poor or otherwise vulnerable forest dwellers within ER-Ps.

Component 2 will finance workshops, South-South exchanges, and publications on current REDD+ topics to enhance the regional-level dialogue on REDD+, promote networking and integration, and facilitate cross-national learning. REDD+ topics may include: (i) benefit-sharing; (ii) participatory forest management; (iii) IPs/civil society-based conservation; (iv) the economics of REDD+ and livelihoods linkages and impacts related to IPs and OFDs in LAC; (v) analysis of legal and policy gaps in selected countries; (vi) analysis of tenure rights in selected countries; and (vii) training on fiduciary management, negotiations and resource mobilization. While studies will be largely developed and/or commissioned by Sotz'il and ACICAFOC separately, workshops and training will be carried out by them jointly and adapted to abide by public health recommendations and legal restrictions in the context of the ongoing COVID-19 pandemic. The main beneficiaries of these knowledge exchange products will be organizations representing IPs and OFDs from all FCPF member countries in the LAC region and, ultimately, in other regions where the FCPF is active, including Sub-Saharan Africa, South Asia and East Asia and the Pacific.

Component 3 will finance the overhead costs of project management by Sotz'il and ACICAFOC, including in connection with sub-project selection and oversight, and all regional workshops and events. Each of IOs will have a management team for the project that will carry out procurement, financial management, environmental and social (E&S) risk management and monitoring and evaluation (M&E) for the proposed activities, including biannual reporting and



preparation of annual work plans and budgets carried out jointly by the two organizations. Component 3 will also finance annual audits of the project accounts by external auditors and any costs related to the coordination of the project-specific Grievance Redress Mechanisms (GRMs).

D. Environmental and Social Overview

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

This regional SRETF project will finance REDD+-related training and capacity building activities among forest-dependent IPs, Civil Society Organizations (CSOs), local communities and their related organizations and networks in 17 countries across the LAC region. Component 1 will focus on the FCPF Carbon Fund countries of Chile, Costa Rica, the Dominican Republic, Guatemala, whereas Components 2 and 3 will cover all the FCPF member countries in LAC, adding Argentina, Belize, Colombia, El Salvador, Guyana, Honduras, Mexico, Panama, Paraguay, Peru, Suriname and Uruguay.

The project activities will not have a physical footprint, and negative environmental impacts will be limited to negligible impacts related to traveling and the organization of meetings and events. Project-related activities, particularly traveling and face-to-face meetings/events, will be designed considering relevant local public health restrictions in the context of the COVID-19 pandemic, and following the World Bank Technical Note on “Public Consultations and Stakeholder Engagement in WB-Supported Operations when there are Constraints on Conducting Public Meetings (March 20, 2020)”. Project implementers in Sotz’il and ACICAFOC will be moving forward with these activities after just having implemented COVID-related sensitization and response actions for forest-dependent IPs and OFDs in REDD+ countries in LAC, which is also being supported by the FCPF (as a discrete activity through a separate grant), so they will have acquired the knowledge needed to act with appropriate caution. In the meantime, activities that do not require travel will be organized virtually through programs most used by the expected participants. Vernacular radio stations that broadcast in local languages will also be used throughout the project implementation period.

D. 2. Borrower’s Institutional Capacity

Asociación Sotz’il and the Asociación Coordinadora Indígena y Campesina de Agroforestería Comunitaria de Centroamérica (ACICAFOC) are well-established CSOs with regional profiles and with experience working with the World Bank through their previous FCPF Capacity Building Program–related work, including in terms of compliance with the applicable World Bank safeguard policies. Their capacity to manage E&S risks in projects as an integral part of other project management tasks has proven Satisfactory during the last four years of implementation of the CBP in its Second Phase, via SRETF projects P155976 and P155978. Moreover, both organizations have demonstrated an ability for continuous learning and improvement, e.g. in terms of screening capacity building activities and addressing issues of social inclusion, including gender. They have also developed and implemented effective GRMs and transparent participatory processes. The Phase 2 GRMs were designed to be administered by each organization and decentralized in their scope, accessible across the different countries which had national-level project activities. These GRMs remain fully operational.

Regarding the WB Environmental and Social Framework (ESF), Sotz’il has already gained initial exposure by working as the selected National Executing Agency for the Guatemala Dedicated Grant Mechanism (DGM), while Phase 3 of the



FCPF CBP will introduce the ESF to ACICAFOC. Both CSOs will be provided relevant capacity building material and training by the WB Task Team as the project preparation proceeds and during the implementation period on an as-needed basis. Regarding COVID-19, as mentioned earlier, by the time project implementation starts both CSOs will have been engaged in COVID response work with their constituency groups across the region and will have built up the capacity needed to manage the related parts of the Phase 3 project activities.

In terms of day-to-day project management, each IO will establish and maintain a management team that will carry out procurement, financial management, E&S risk management and M&E responsibilities in relation to the proposed activities. The teams will be headed by the same full-time Project Coordinators who managed the second phase of this project, and many of the specialists supporting them on a part-time basis will also be carried over from Phase 2. Each of these teams will assign a focal point to take responsibility for project compliance with the relevant ESF requirements by the declaration of grant effectiveness.

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

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Low

The project will have no physical footprint as all the activities to be financed will fall under "Type 3: Strengthening Borrower Capacity" technical assistance (TA). Therefore, the risk of potential environmental impacts is negligible. The REDD+ awareness raising, capacity building and knowledge sharing activities will be designed considering the principles of the relevant Environmental and Social Standards (ESS), especially ESS1, 2, 4, 6, 7, 8 and 10. Regarding COVID-19, the project will also provide a platform for addressing the knowledge gap of IPs and OFDs with respect to the impacts of the pandemic through local organizations knowledgeable of and sensitive to the culturally specific needs of the participating IP, LC and CSO representatives.

Social Risk Rating

Moderate

The project is not expected to have adverse social impacts. The project will fund low-risk activities related to strengthening capacity building processes in relation to REDD+ at both the country and regional levels. It will do this in a highly participatory manner by working both with and through IP organizations, CSOs and other forest-dependent groups that often face exclusion, limited access to resources and discrimination. In the previous phase of the FCPF CBP project, both IOs established strong partnerships with organizations that represent vulnerable populations, including women, youth and Afrodescendants. This project will deepen and solidify partnerships such as the ones established with the Afrodescendant organizations "Federación Hondureña de Cooperativas Agroforestales" and "Asociación para el Desarrollo Juvenil de la Costa Pacífica, JUVENTUD 500" in Colombia. From a social risk perspective, relevant standards considered for this project include ESS1, 2, 4, 7, 8 and 10.

Potential Moderate social risks such as elite capture, counterproductive communications, consultation gaps and/or lack of inclusion or representation will be mitigated by (i) ensuring that capacity building and awareness raising programs are consistent with the ESF and incorporate appropriate E&S objectives; (ii) ensuring that activities are widely consulted on with the key stakeholders and enjoy broad support of their main beneficiaries; and (iii) promoting transparency and public information disclosure. In addition, to ensure the inclusion of populations such as

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Afro descendants, women, and youth in project activities, the IOs will design capacity building activities taking into account women’s roles as mothers and caregivers, which will include allowing for the presence of children in project events, so women feel comfortable participating, taking them along. On youth inclusion, the project will ensure that linkages between capacity building and the potential for boosting livelihoods via REDD+ activities are clear. This has proven to be an effective strategy to increase the participation of youth. ACICAFOC will also consider engaging a dedicated consultant to provide advice on engaging further with Afro descendant organizations. The COVID-19 pandemic has further exacerbated social vulnerabilities across the region and limited the capacity to mobilize and congregate through traditional means. The project will take into account official health and sanitary protocols to limit the beneficiaries’ exposure to the virus in project-related activities and will adjust participatory methodologies to ensure the inclusion of those with limited access to virtual communication technologies.

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:

ESS1 is relevant for the project. The project will not have a physical footprint, as its activities will consist of capacity building, training services, events and online courses. Related to ESS1, the project follows the Advisory Note of the Operations Environmental and Social Review Committee (OESRC) on “Technical Assistance and the Environmental and Social Framework” (May 2019). The relevant requirements set out in paragraphs 14-18 of ESS1 will be applied as relevant and appropriate to the nature of potential risks and impacts identified in case of different activities. The terms of reference (ToRs), work plans or other documents defining the scope and outputs of the project’s TA activities, including training materials, knowledge exchanges and analytical work will be prepared so that the advice and other support provided is consistent with ESS1-10, out of which ESS1, 2, 4, 6, 7, 8 and 10 are deemed to be relevant to the project as per its initial design. Activities implemented by Sotz’il and ACICAFOC following the completion of the project that are not financed by the World Bank, or activities that are not directly related to the TA provided under the project, will not be subject to the World Bank ESSs.

The screening of the project activities concluded that they fall solely under Type 3 of TA activities: strengthening Borrower capacity. Consequently, they will not support (i) the preparation of future investment projects (whether or not funded by the World Bank), nor (ii) the formulation of policies, programs, plans, strategies or legal frameworks. While capacity building activities may involve support to institutions in carrying out or overseeing activities that do have potentially significant E&S implications, such implications are not expected under the FCPF CBP, either in the LAC region or worldwide. Instead, the project activities are expected to have minimal or no E&S impacts, while more diffuse and induced impacts, often playing out over a longer term, might still ensue. Consequently and importantly, in line with the overall capacity building nature of the project, responsible personnel in Sotz’il and ACICAFOC will be trained to consider any E&S implications in the design and implementation of the project activities.

During project implementation, any E&S impacts will be managed by: (i) conducting screening to ensure that activities under Component 1 (e.g. capacity building and awareness raising programs) are consistent with the ESF and incorporate appropriate E&S objectives; (ii) ensuring that activities are widely consulted on with the key stakeholders and enjoy broad support of their main beneficiaries; and (iii) promoting transparency and public information



disclosure. The ToRs for the capacity building activities will be designed in alignment with the principles of the relevant ESSs. In essence, the TA to be provided under the project provides an opportunity to build counterpart capacity for integrating E&S concerns into their work.

Areas where “Use of Borrower Framework” is being considered:

N/A

ESS10 Stakeholder Engagement and Information Disclosure

ESS10 is relevant for the project. Component 1 and 2 are composed purely of stakeholder engagement activities including capacity building, awareness raising and knowledge exchange. The potential stakeholders will be identified as forest-dependent IPs, civil society, local communities, and their representative organizations and networks in the participating FCPF countries in the LAC region. All public gatherings will be designed taking into account relevant local public health requirements in the context of the COVID-19 pandemic, including the WB Technical Note on “Public Consultations and Stakeholder Engagement in WB-Supported Operations when there are Constraints on Conducting Public Meetings (March 20, 2020)”.

Given the project’s nature and the scale of its risks and impacts, a stand-alone Stakeholder Engagement Plan (SEP) is not deemed necessary. Instead, the elements of a SEP will be integrated into the Environmental and Social Commitment Plan (ESCP), as per ESS10, paragraph 13, footnote 3. Among these elements, the actions in the ESCP will thoroughly describe engagement principles and measures and reference supporting instruments, such as guidance notes, to ensure adherence to ESS10 requirements. All relevant stakeholders in the eligible countries will have equal opportunities to engage with the project through a transparent selection process described in the Operations Manual (OM) to be adopted for the project (based on the OMs used for the Phase 2 projects). The first participatory process will be for activities to be selected through a sub-granting mechanism. Sotz’il and ACICAFOC will issue a joint call for proposals to IPOs and CSOs in the Carbon Fund countries, using agreed upon procedures and templates, and screen the applicants and their proposals based on a set of criteria, including applicants’ legal status, experience and capacities, and proposals’ alignment with the respective country’s REDD+ priorities, proposed participatory approaches, and expected impacts. The screened proposals will be reviewed by a Technical Advisory Committee (TAC), whose members will ensure activities’ technical soundness. The results of the review will be forwarded to Sotz’il and ACICAFOC, who will use them to select the capacity building activities for the World Bank Task Team’s no-objection. Following the signing of sub-grant agreements between Sotz’il and ACICAFOC and the selected entities, Sotz’il and ACICAFOC will monitor the implementation of sub-project activities and provide technical and operational support as needed to the selected IPOs/CSOs.

Activities and work plans under Component 1 will be discussed and agreed upon with the beneficiary communities to ensure they address their specific needs, and mechanisms will be put in place to ensure the engagement of women and youth in the planning and execution of the project activities.

The project’s GRMs will be available to all project stakeholders, and will be designed to guarantee confidentiality, accessibility and translations to indigenous languages where necessary. The description of the GRMs will cover their operational principles, processing responsibilities, internal administration, and the frequency of periodic monitoring reports. Component 3 will finance costs related to the operation of the GRMs by both IOs. The ESCP will describe the



IOs' commitments to monitoring the functionality of the GRM, including information on reporting frequency, methods and organizational responsibilities.

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

ESS2 is relevant for the project. Labor Management Procedures (LMP) will be compiled by Sotz'il and ACICAFOC with support by the World Bank Task Team as needed. The project activities will involve CSOs' staff and contracted consultants, specifically trainers and facilitators, and possibly field monitors and validators considered as project workers to which ESS2 will apply. A stand-alone LMP will be prepared and disclosed before grant approval, based on Sotz'il and ACICAFOC's internal work policies, codes of conduct and labor arrangements. An assessment of the organization's respective work policies will be carried out during project preparation to evaluate if they meet ESS2 requirements. If any aspect of these is deemed insufficient or in need of supportive information, the organizations will adopt the necessary adjustments to their policies and procedures, and include them in the final version of the LMP prior to grant effectiveness.

Although labor considerations will be limited to the standard aspects considering worker wellbeing and health and safety, the LMP will include a code of conduct acceptable to the World Bank to mitigate the risk of sexual exploitation and abuse (SEA)/sexual harassment (SH) or misconduct in the workplace and in contact with communities. There is no risk of potential child labor use in this project. The LMP will also ensure that national labor-related laws are upheld related to public service and related human resource policies, labor law, and institutional roles related to enforcement of the laws, including recruitment, discipline, appraisals and dismissals. Separate GRMs for work-related grievances will be provided to project staff and consultants, including necessary considerations for confidentiality and whistle-blower protection. These GRMs will be described in the LMP, including information on organizational responsibilities. The necessary training for project workers, including on workers' codes of conduct, will be included in the ESCP.

ESS3 Resource Efficiency and Pollution Prevention and Management

The project activities will be restricted to TA to support capacity building, which is not expected to have direct or indirect risks of pollution to air, water, and land, or require any considerable consumption of resources that might threaten people, ecosystem services or the environment at any level.

ESS4 Community Health and Safety

ESS4 is relevant for the project. The project activities involving IP communities' participation will be designed taking into account relevant local public health requirements in the context of the COVID-19 pandemic, including World Bank Technical Note on "Public Consultations and Stakeholder Engagement in WB-Supported Operations when there are Constraints on Conducting Public Meetings (March 20, 2020)". The project will ensure that measures and criteria to reduce the risk of gender based violence (GBV) and/or sexual exploitation and abuse (SEA)/sexual harassment (SH)



as a part of project activities that imply community engagement are in place, especially as part of the IOs' internal policies.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The project will not involve any physical investments having on-the-ground impacts.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

ESS6 is relevant for the project. The project will not finance any physical activities. However, it will help to develop the knowledge and capacities of IPs and OFDs that are dependent on forest resources and, therefore, are uniquely positioned to contribute to, and benefit from, national and sub-national REDD+ programming that aims to promote sustainable forest management. The project will include activities related to topics such as REDD+ benefit sharing; participatory forest management; piloting of IPs/civil society-based conservation; capacity building for sustainable forest management and conservation; and capacity building for non-timber/alternative livelihoods. The learning and knowledge-sharing products developed under the project will be designed incorporating the principles of ESS6.

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

ESS7 is relevant for the project. Latin America is home to 45 million IPs, which is eight percent of the region's total population; this nevertheless accounts for 17 percent of the extreme poor. IPs fare worse off across all development indicators, from life expectancy reaching up to 30 years less than non-IPs, to significant gaps in access to basic services and opportunities to access finance, professional development and employment. These gaps are even more severe for indigenous women. IP participation at the local, national and regional levels has been limited by historical patterns of discrimination and exclusion.

The CBP Phase 3 project is a continuation of the FCPF's robust engagement with IPs across LAC, built from a diverse history of participatory processes, TA, capacity building and cross-sectoral partnerships, including through Phases 1 and 2 of the CBP. Both implementing organizations have deep-rooted relationships and partnerships with regional IP groups; Sotz'il has historical linkages with the "Foro Indigena de Abya Yala (FIAY)", a referential network of IP organizations focused on providing technical capacity and supporting IP representation in international platforms. Aligned with their mission and past experience in Phase 2, Sotz'il has experience developing culturally appropriate consultations in their work methodologies, including capacity building activities articulated through iterative and participatory processes. These will be central to the project, in order to include IP perspectives and concerns in relation to REDD+ and Carbon Fund-supported operations. Given that a significant number of project beneficiaries will be IPs in LAC, and also that it will be co-designed and implemented by one of the region's leading IPOs, this is considered an Indigenous Peoples Project. For this reason, neither an Indigenous Peoples' Planning Framework (IPPF) nor Indigenous Peoples Plans are considered necessary.

The ToRs of project activities such as workshops involving capacity building activities in IP areas will include a reference to the relevant provisions of ESS7 to ensure, among other things: (i) the inclusion of principles of cultural appropriateness in training activities; and (ii) the participation of specific vulnerable groups or groups whose interests



are traditionally underrepresented, such as women, elders, youth and persons with disabilities. Engagement activities will be undertaken considering traditional approaches to community engagement and decision-making, including in relation to the project’s GRMs.

ESS8 Cultural Heritage

ESS8 is relevant for the project. The capacity building and awareness raising activities at different levels will be designed to take into account requirements for the identification and recognition of cultural heritage aspects of forest management, which could include consultations with relevant stakeholders and cultural heritage authorities, legislative analysis for managing cultural heritage, and review of available heritage inventories and maps to identify cultural heritage. ESF-related training for the project will ensure that Sotz’il and ACICAFOC understand the nature and significance of typical REDD+ investments and interventions in terms of their potential E&S risks to and impacts on both tangible and intangible cultural heritage.

ESS9 Financial Intermediaries

ESS9 is not relevant for the project as it will not involve participation of any financial intermediary.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

N/A

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

Actions to be completed prior to Bank Board Approval:

Sotz’il and ACICAFOC will (i) disclose a description of one or more Grievance Redress Mechanisms (GRM) for the project; (ii) prepare and disclose an Environmental and Social Commitment Plan (ESCP); and (iii) prepare and disclose Labor Management Procedures (LMP) describing Sotz’il and ACICAFOC’s work policies, procedures, codes of conduct and labor-specific GRMs. Given that no stand-alone SEP will be prepared, the ESCP will include measures and actions to reflect the necessary elements of a SEP and the ESS10 requirements, as per paragraph 13, footnote 3 of ESS10.

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

Sotz'il and ACICAFOC will (i) implement the ESCP and revise and redisclose it as necessary; (ii) implement the LMP following the principle of continuous improvement throughout the project implementation period; (iii) operate the overall project GRMs and the labor-specific GRMs, including information about the monitoring of their functionality, reporting frequency and organizational responsibilities, as relevant; (iv) prepare ToRs for project activities in line with principles of the relevant ESSs; and (v) provide ESF-related training to project workers and stakeholders as relevant, including on workers' codes of conduct.

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Asociación Sotz'il

Borrower: Asociación Coordinadora Indígena y Campesina de Agroforestería Comunitaria de Centroamérica (ACICAFO)

Implementing Agency(ies)

Implementing Agency: ACICAFOC

Implementing Agency: Asociacion Sotz'il

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VI. APPROVAL

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Public Disclosure



The World Bank

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Public Disclosure