



uThukela MPA Ecosystem Based Management Project

Project Safeguard Disclosure Document

WILDTRUST

Table of contents

1.	Purpose of this document.....	4
2.	Project Overview.....	5
2.1	Basic project information.....	5
2.1.1	Project location in the uThukela MPA.....	5
2.1.2	Project objectives, proposed outcomes and key components.....	8
2.1.3	Project timeframe and budget.....	14
2.1.4	Project partners and responsibilities.....	14
3.	Project E&S risk management (ESMP).....	16
3.1	Projects Environmental & Social Management Plan (ESMP) Objectives.....	16
3.2	National legislation and International Safeguards.....	17
3.3	Risk Management Strategy.....	20
3.4	Implementation Roles & Responsibilities.....	35
4.	Stakeholder Engagement Plan.....	35
4.1	Purpose of the Stakeholder Engagement Plan.....	35
4.2	Identified Stakeholders.....	36
4.3	Summary of Past and Planned Project Stakeholder Engagement.....	41
4.3.1	Past Stakeholder engagement.....	41
4.3.2	Planned Stakeholder engagement.....	41
4.4	Informed Consultation and Participation process.....	42
4.5	Record Keeping, monitoring & evaluation.....	43
4.5.1	Stakeholder Register.....	43
4.5.2	Stakeholder Register.....	43
5.	Grievance Mechanism.....	44
6.	Environmental and Social Code of Practice (ESCOP).....	44
7.	Process Framework.....	44
7.1	Purpose of the Process Framework.....	45

7.2 Identifying, assessing and minimising impacts 45

7.3 Mitigation measures 55

8. Disclosure process..... 57

9. Conclusion 58

1. Purpose of this document

WILDTRUST is in the final stages of a project proposal to the Blue Action Fund for the “Ecosystem-based adaptation (EbA)” call for proposals (Green Climate Fund funding). As part of this proposal, we were required to engage independent consultants to conduct an Environmental & Social Assessment (ESA) and develop preliminary Safeguards for the uThukela Marine Protected Area (MPA) Ecosystem-Based Management Project. We are also required to publicly disclose our “Safeguard Package” for 30 days before Blue Action Fund’s Supervisory Board can take a final funding decision.

The full Safeguard Package will be disclosed in the English language on Blue Action Fund’s website and will be submitted by Blue Action to the Green Climate Fund. The “Safeguard Package” will include the Environmental & Social Management Plan (ESMP), Process Framework and Grievance Mechanism, and will be available to all interested stakeholders to view on the Blue Action Fund’s website.

In addition, a summary of the project and safeguard information, will be translated into the local language(s), made available to project-affected people and other stakeholders.

This Project Safeguards Disclosure Document serves as this required summary, containing information drawn from the project proposal, the Environmental and Social Assessment (ESA) and associated safeguards prepared by consultants, (ESMP, Stakeholder Engagement Plan (SEP), Process Framework and Grievance Mechanism) and will be translated into isiZulu. It will also clarify how the project intends to disclose this information, to demonstrate our efforts to clearly communicate this information through formats and channels that are accessible to stakeholders and project-affected people

It is important to note that stakeholders with access to the Summary only, can request further/more detailed information as part of the stakeholder engagement process, and this information will be provided in a timely and accessible manner.

2. Project Overview

2.1 Basic project information

2.1.1 Project location in the uThukela MPA

The project location is in KwaZulu-Natal province, South Africa. It is focused on the uThukela MPA which stretches in the south from just north of Tinley Manor to Port Durnford in the north. (**Figure 1**). It is adjacent to and within two district municipalities (Ilembe and King Cetshwayo) and four local municipalities (uMhlathuze, uMlalazi, Mandeni and KwaDukuza)

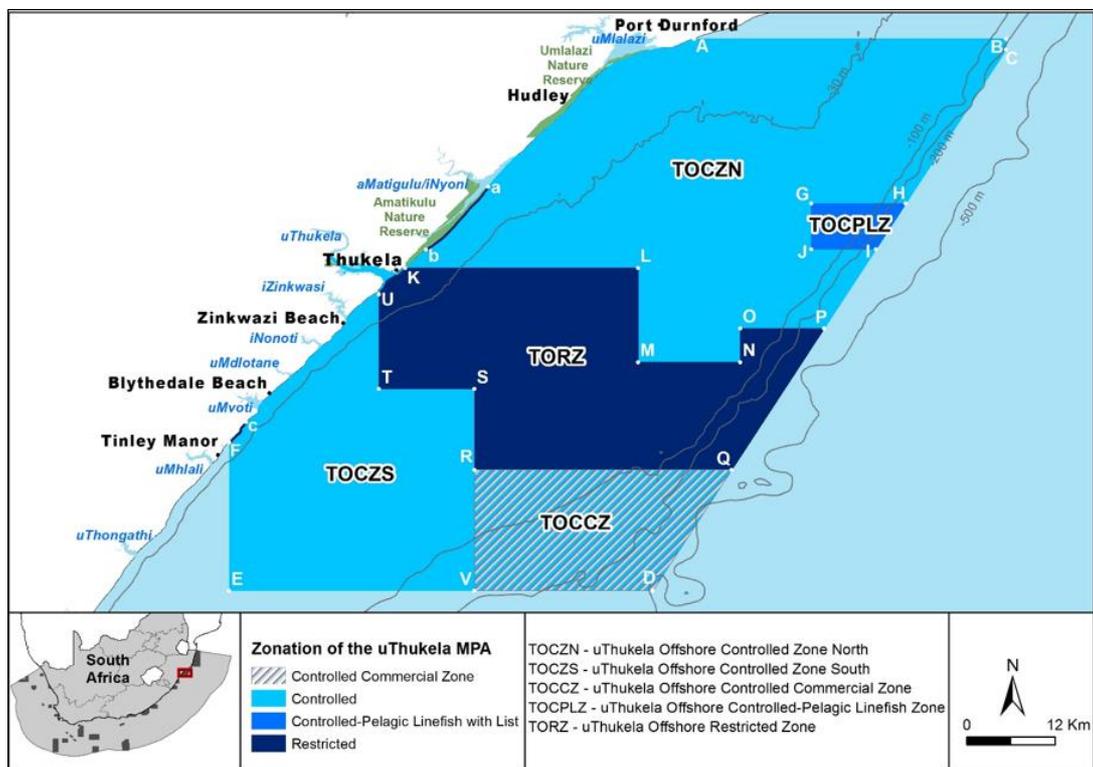


Figure 1: uThukela MPA and zonation's.

The uThukela MPA & Associated Zonation

The uThukela MPA was gazetted in South Africa in May 2019 in terms of Section 22A of the National Environmental Management: Protected Areas Act (Act no. 57 of 2003). MPA is zoned into an inshore and an offshore area.

The two inshore **Restricted Zones (RZs)** and the two inshore **Controlled Zones (CZs)** 1) Amatikulu Inshore Restricted Zone (AIRZ); 2) uSetheni Inshore Restricted Zone (SIRZ) 3) Mtunzini Inshore Controlled Zone (MICZ) 4) uThukela Inshore Controlled Zone (TICZ).

The offshore area consists of three offshore **Controlled Zones**, one offshore **Controlled-Pelagic Linefish Zone** and one offshore **Restricted Zone**. These are as listed; 1) uThukela Offshore Controlled Zone North; 2) uThukela Offshore Controlled Zone South; 3) uThukela Offshore Controlled Commercial Zone; 4) Offshore Controlled-Pelagic Linefish, and 5) uThukela Offshore Restricted Zone.

In addition to the MPA (which includes the uThukela estuary), two existing Nature Reserves are located within the project area, together forming the Siyaya Coastal Park: 1) Amatikulu Nature Reserve 2) uMlalazi Nature Reserve, which include three Estuarine Functional Zones (EFZs) arising from 4 rivers that join this stretch of coast; Siyaya, uMlalazi and Amatikulu-Nyoni EFZs.

South of the uThukela estuary, there are 5 other rivers that join the coast along the uThukela MPA shoreline, although their EFZs are not within the MPA: Zinkwazi Nonoti River, uMdlotane, uMvoti and uSetheni.

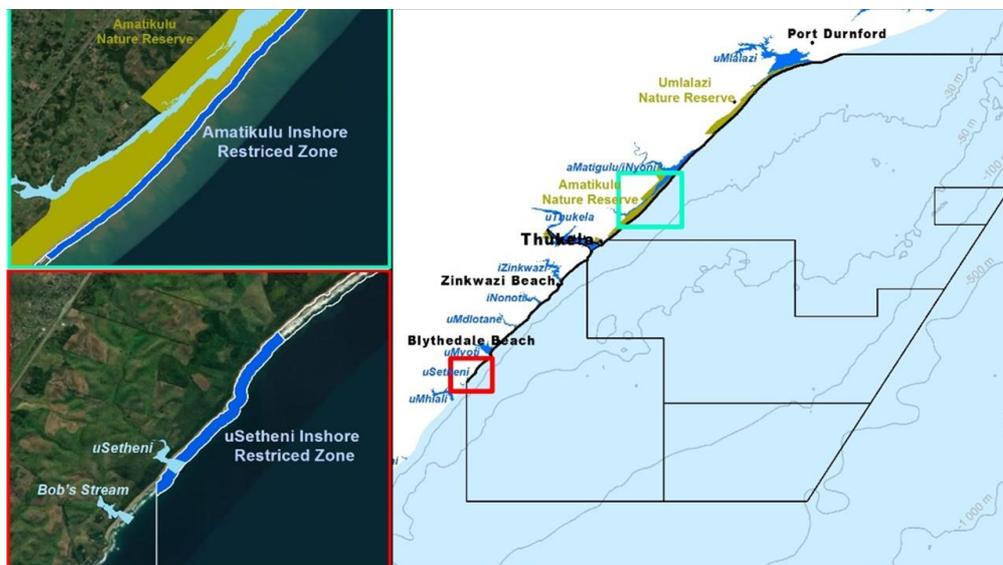


Figure 2: The two inshore restricted Zones that form part of the uThukela MPA

The project will focus on the marine component of the MPA and the estuarine functional zones of five estuaries, and the lower catchments of the rivers that feed into these estuaries. These 5 estuaries are the Zinkwazi and uThukela, and the 3 estuaries in the Siyaya Coastal Park (uMlalazi, Siyaya and Amatikulu-Nyoni). The Siyaya Coastal Park runs from the mouth of the uMlalazi River to the southern boundary of the Amatikulu Nature Reserve (**Figure 3**).

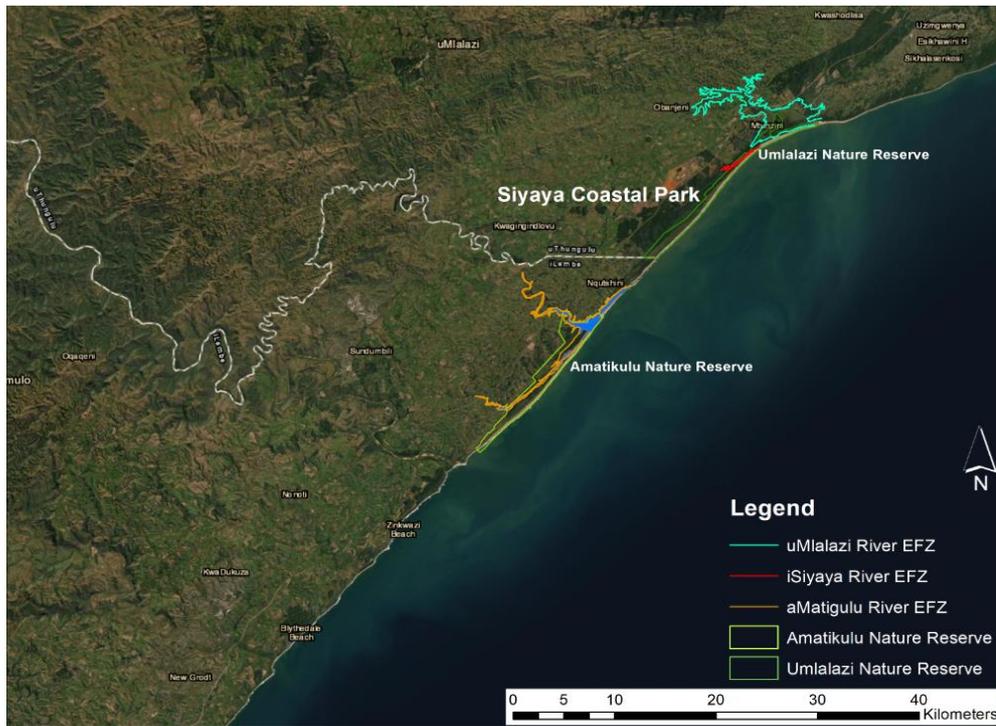


Figure 3: Siyaya Coastal Park, including the Amatikulu Nature Reserve and the Umlalazi Nature Reserve

The project area includes the uMlalazi, Siyaya and Amatikulu-Nyoni Estuaries which fall within existing protected areas managed by EKZNW Wildlife (EKZNW) and are managed as part of the nature reserves (Amatikulu Nature Reserve and uMlalazi Nature Reserve, which together form the Siyaya Coastal Park) and includes 3 estuaries. There is a small strip of coastline between the Amatikulu Nature Reserve and the rest of the Siyaya Coastal Park, which is run by the municipality, along with a small piece of Tribal Authority-managed land.

The project will also support the development of Estuary Management Plans (EMP's) in the other 6 estuaries that join the coast in the MPA south of the Siyaya Coastal Park. As such, the full project area includes all of the MPA area and the coastal areas within the yellow line in **Figure 4** and the two Nature Reserves. Harold Johnson Nature Reserve is not included within the Project Area however, the uThukela River Estuary (included in the boundary of the MPA up to the 10m contours) is included in the Project Area.

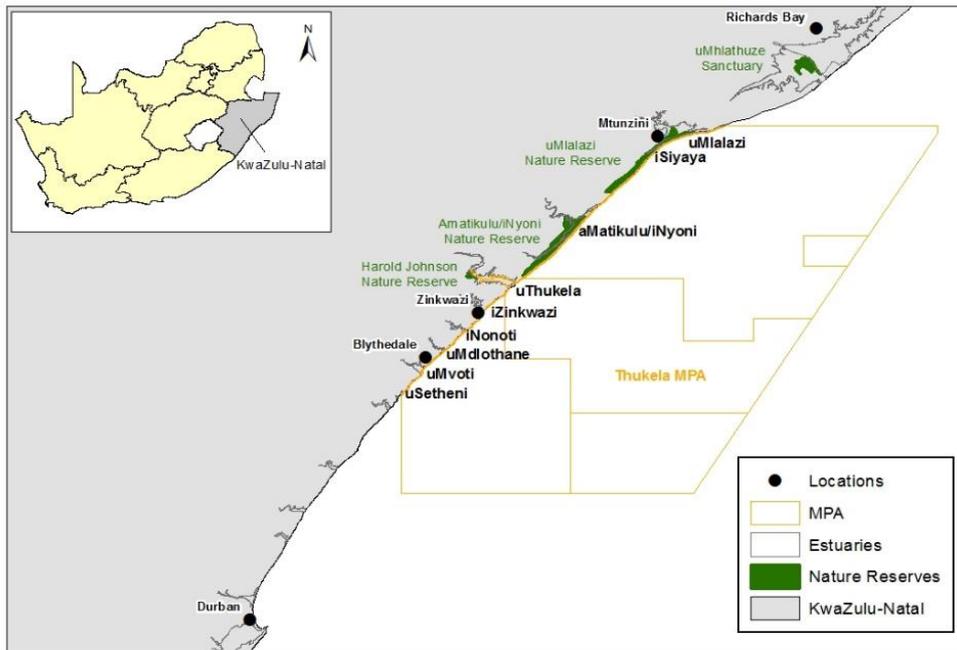


Figure 4: uThukela MPA Ecosystem-Based Management Project area, including the associated estuaries, key towns, and the three Nature Reserves in this region.

2.1.2 Project objectives, proposed outcomes and key components

Success for this project would see the globally significant uThukela marine protected area (MPA) effectively managed and its important climate-relevant ecosystems restored and protected, delivering socio-economic resilience for vulnerable coastal communities, and reducing climate change-related risks. This outcome will be achieved by working with authorities, stakeholders, and collaborators to deliver:

1. Effective management of the recently designated uThukela MPA, including coral reefs, estuaries (mangroves, reed beds, saltmarsh meadows and riparian vegetation) and coastal dune cordon.
2. Restoration of ecosystems, particularly relevant for climate change adaptation (coral reefs, mangroves, reed beds, saltmarsh meadows, riparian vegetation, and coastal dune cordon).
3. Improved livelihoods and food security for vulnerable communities affected by uThukela MPA through nature-based solutions and EbA approaches.
4. International and regionally relevant lessons learnt and disseminated, and model provided of socio-ecological resilience through nature-based solutions in and around a financially sustainable MPA.

A summary of the project activities is provided in **Table 1**.

Table 1: Project Outputs, Indicators and Activities

OUTPUTS		INDICATOR	ACTIVITIES			
1	OUTPUT 1: IMPROVED RESOURCES, INSTRUMENTS AND CAPACITIES FOR MPA MANAGEMENT AND SUSTAINABLE USE	<i>Indicator 1.1: Management Plan for uThukela MPA</i>	1.1.1	Stakeholder engagement and EbA awareness generation		
			1.1.2	uThukela MPA Management Plan consultation and finalisation		
			1.1.3	Climate mitigation and adaptation knowledge-buildings workshops		
			1.1.4	MPA Stakeholder Forum meetings		
			1.1.5	uThukela Governance Liaison Forum establishment and meetings		
			1.1.6	Rural Community Workshops (awareness linked to zonation's, restrictions, and constructive engagement with authorities)		
			1.1.7	Environmental and Social Management System (ESMS)		
				<i>Indicator 1.2: Management Plans for nine (9) MPA-associated estuaries</i>	1.2.1	Nine (9) Estuary Management Plans production
				<i>Indicator 1.3: Monitoring, control, and enforcement techniques.</i>	1.3.1	MPA Demarcation and Information Distribution
					1.3.2	Establish a Surveillance Centre infrastructure
					1.3.3	Training in utilisation of the remote surveillance equipment and software
					1.3.4	Marine and estuarine enforcement and monitoring
					1.3.5	MPA Management Staff Training
					1.3.6	MPA Honorary Officers (<i>provide training support for policies and procedures</i>)
					1.3.7	Monitoring and enforcement for protection of ecosystems in estuarine functional zone
					1.3.8	Support development of a specific Law Enforcement Strategy for the MPA
					1.3.9	Management Effectiveness assessment processes for adaptive management
				<i>Indicator 1.4: Financial assessments and strategies for sustainable financing developed.</i>	1.4.1	Establish a team to implement and guide Sustainable Financing strategies development
					1.4.2	Baseline economic valuation of the ecosystems and natural assets in the MPA and associated estuaries
					1.4.3	Evaluate the financing requirements and planning for the MPA
					1.4.4	Financial Risk Management Plans
					1.4.5	Workshops to assemble experts and potential partners in sustainable financing
					1.4.6	Implement identified sustainable financing mechanisms

OUTPUTS		INDICATOR	ACTIVITIES			
2	OUTPUT 2: STRENGTHENED ADAPTIVE CAPACITY AND REDUCED EXPOSURE TO CLIMATE RISKS	<i>Indicator 2.1: Development of climate risk assessments for understanding and reacting to climate- related risks</i>	2.1.1	Ecosystem baseline survey and assessment		
			2.1.2	Restoration of estuarine and riverine ecosystems		
			2.1.3	Effective implementation of Management Plans		
			2.1.4	Training and information dissemination (climate-smart sustainable harvesting and farming practices)		
			2.1.5	Risk Assessment Report		
		<i>Indicator 2.2: Implementation of early warning systems</i>	2.2.1	Installation of KZN Bight Sentinel Site		
	2.2.2	Community based early flood warning system				
3	OUTPUT 3: DEGRADED COASTAL ECOSYSTEMS, WHICH ARE PARTICULARLY RELEVANT FOR CLIMATE CHANGE ADAPTATION, REHABILITATED.	<i>Indicator 3.1: Rehabilitation of beaches and coastal dunes</i>	3.1.1	Surveys of beaches and dune vegetation		
			3.1.2	Rehabilitate the beach and dune vegetation to a natural state		
			3.1.3	Community involvement in beach and dune vegetation restoration		
		<i>Indicator 3.2: Rehabilitation of estuarine ecosystems</i>	3.2.1	Surveys of estuaries		
			3.2.2	Rehabilitate estuarine ecosystems		
			3.2.3	Community involvement in estuarine restoration		
		<i>Indicator 3.3: Rehabilitation of riverine riparian vegetation, estuary-supporting wetlands</i>	3.3.1	Surveys of riparian vegetation		
			3.3.2	Rehabilitate the riparian zone to a natural state		
			3.3.3	Community involvement in riparian zone restoration.		
		<i>Indicator 3.4: Restoration of coral reef fish populations</i>	3.4.1	Coral Reef Fish Surveys		
			3.4.2	Fisher awareness workshops		
		4	OUTPUT 4: SEQUESTERED CARBON OR REDUCED EMISSIONS	<i>Indicator 4.1: Carbon sequestered in functional ecosystems maintained.</i>	4.1.1	Estimation of carbon sequestered in mangroves and coral reefs.
<i>Indicator 4.2: Protection of coral reefs</i>	4.2.1				Physical mapping of mesophotic coral reefs.	
	4.2.2			Coral Reef Ecosystem surveys.		
	4.2.3			Conduct workshops to raise awareness amongst stakeholders to increase coral reef protection		
<i>Indicator 4.3: Protection of mangrove forests</i>	4.3.1			Surveys of mangrove vegetation		
	4.3.2			Development of alternatives to direct exploitation from mangrove ecosystem		
	4.3.3			Introduction of sustainable income generating opportunities for fishers		
5	OUTPUT 5: CLIMATE-RESILIENT AND SUSTAINABLE LIVELIHOODS PROMOTED			<i>Indicator 5.1: Sustainable livelihood initiatives</i>	5.1.1	Baseline livelihoods and Perceptions Survey and reassessment
					5.1.2	Identification of potential livelihood initiatives
		5.1.3	Community eco-cultural tour guide livelihood initiative.			
		5.1.4	Community-run campsites			

OUTPUTS		INDICATOR	ACTIVITIES	
			5.1.5	Support for communities not at focal sites.
		<i>Indicator 5.2: Women leadership and economic empowerment</i>	5.2.1	Development of a Gender Action Plan for the project
			5.2.2	Leadership training
			5.2.3	Enterprise development training
			5.2.4	Micro-enterprise establishment
			5.2.5	Peer support groups.
		<i>Indicator 5.3: Youth employment and career development opportunities</i>	5.3.1	Climate adaptation youth job creation
			5.3.2	Career development support
			5.3.3	Ocean Stewards career development and support
		<i>Indicator 5.4: Climate-smart practices for improved livelihoods</i>	5.4.1	Community Climate Adaptation Resource Centre
			5.4.2	Training, awareness, and education (impacts of Climate Change and sustainable resource use)
			5.4.3	Demonstration of climate-smart homestead-based solutions
			5.4.4	Promote sustainable resource use practices and reservation of important natural cultural sites
6	OUTPUT 6: ENHANCED KNOWLEDGE, EXPERTISE AND CAPACITY OF RELEVANT NATIONAL AGENCIES TO USE EBA APPROACHES FOR CLIMATE-RESILIENT COASTAL ZONE MANAGEMENT	<i>Indicator 6.1: Dissemination of lessons learned about EbA approaches</i>	6.1.1	Regional WIO Workshop
			6.1.2	Online Webinar Series
			6.1.3	Synthesis of Lessons Learned
			6.1.4	International and regional symposia attendance
		<i>Indicator 6.2: Media and publications (awareness building of EbA approaches and MPA benefits)</i>	6.2.1	Community Radio
			6.2.2	Social Media
6.2.3	Articles			
7	OUTPUT 7: STRENGTHENED INSTITUTIONAL AND REGULATORY SYSTEMS FOR CLIMATE-RESPONSIVE PLANNING AND DEVELOPMENT	<i>Indicator 7.1: Promotion of EbA approach in MPA and Estuary Management Tools.</i>	7.1.1	Workshops
			7.1.2	Guideline document (outlining the importance of EbA approaches)
		<i>Indicator 7.2: Regulatory incentive systems for climate resilience implementation</i>	7.2.1	Legal review and assessment
			7.2.2	Carbon asset identification.
			7.2.3	Pilot implementation (of an incentive funding mechanism)

Location of project activities

The area where the project will **support effective management** includes three areas of formal protection for which EKZNW is the management authority, i.e.:

1. the new uThukela MPA (including the uThukela estuary) (4099 kms²);
2. the existing Siyaya Coastal Park, including:

- a. uMlalazi Nature Reserve (19.8 kms²), and
- b. Amatikulu Nature Reserve (19.2 kms²)

The project area where **primary sustainable livelihood interventions and climate-smart agricultural practices** will be introduced will be in and around the Siyaya Coastal Park (including the uMlalazi Nature Reserve with the Siyaya and uMlalazi estuaries, and the Amatikulu Nature Reserve with the Amatikulu--Nyoni estuary) and will focus on communities living adjacent to the Siyaya Coastal Park to the north of the uMlalazi Estuary (Nyembe community) north and living alongside the Amatikulu Nature Reserve to the north of the Amatikulu-Nyoni estuary (Nqutshini community).

The Nqutshini community (alongside the Amatikulu-Nyoni) is part of the Mandeni Local Municipality within the Ilembe District Municipality), The Nyembe community (alongside the uMlalazi Estuary) is part of the uMlalazi Local Municipality within the King Cetshwayo District Municipality, as illustrated in **Figure 5** and **Figure 6** below.

These two communities will be the locations for the Climate Adaptation Community Resource Centres and extension activities. These 2 rural communities (Nqutshini community and Nyembe community) were selected because of their vulnerability to climate change-related impacts, and socio-economic needs. Both communities utilise the estuarine functional zone as well as the beach zone for subsistence agriculture and fishing and live immediately adjacent to the 2 nature reserves and coastline.

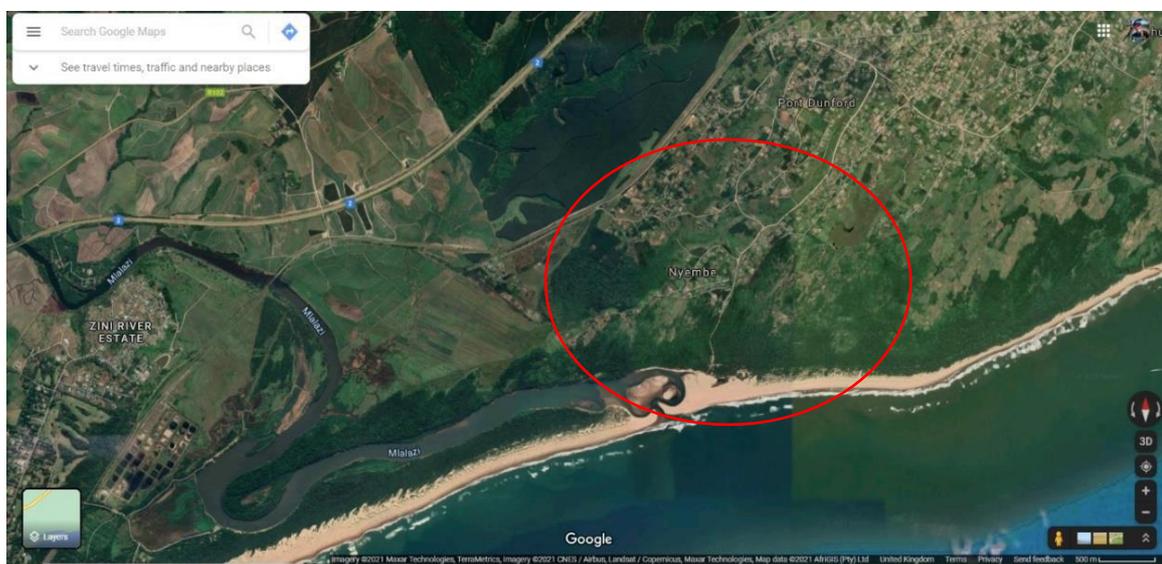


Figure 5: The location of the Nqutshini Community on the Amatikulu-Nyoni

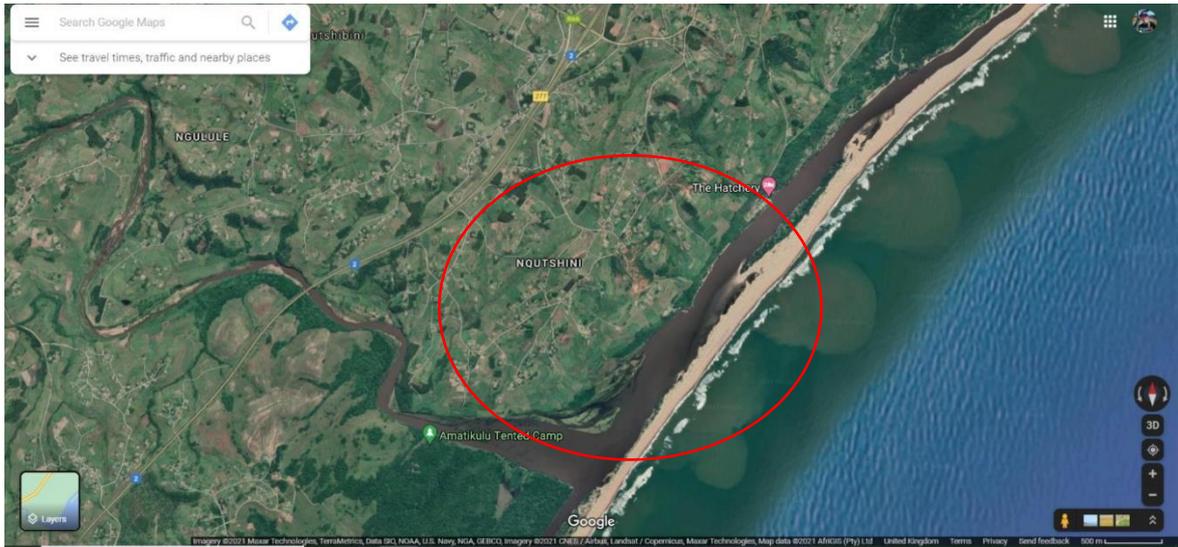


Figure 6: The location of the Nyembe Community (Port Durnford) on the uMlalazi Estuary

Figure 7 illustrates the **broader geography over which project activities will occur**. The project's primary impact areas in terms of management effectiveness and planning, ecosystem protection and restoration and livelihood support are the uThukela MPA itself, the Siyaya Coastal Park and 3 associated estuaries, and the 2 focal communities living immediately adjacent to the park (within 5 km, north of the uMlalazi and Amatikulu estuaries). Impact at areas south of the Siyaya Coastal Park include improved stakeholder engagement and management planning processes and enhanced law enforcement capacity, support for inclusive knowledge generation and sharing, baseline ecological and social surveys, development of Estuarine Management Plans (EMPs) and identification of livelihood options but does not extend to active implementation of livelihood interventions or direct support for management activities to implement the EMPs. Although livelihood interventions will not be implemented at and around the estuaries outside of the Siyaya Coastal Park, and restoration activities are not planned for south of uThukela estuary, identification of livelihood options and restoration needs will be done during the development of the EMPs, to promote mitigation of risks identified by the project and to promote regional good governance, empowerment, and inclusivity for long-term livelihoods improvement.

Restoration activities (involving local communities) will however also be implemented for the uThukela EFZ and the dunes around the north of the uThukela estuary mouth (see yellow sites in **Figure 7**) and within the Zinkwazi EFZ. This will create jobs as well as regeneration of degraded climate relevant ecosystems this improving socio-ecological resilience in these areas.

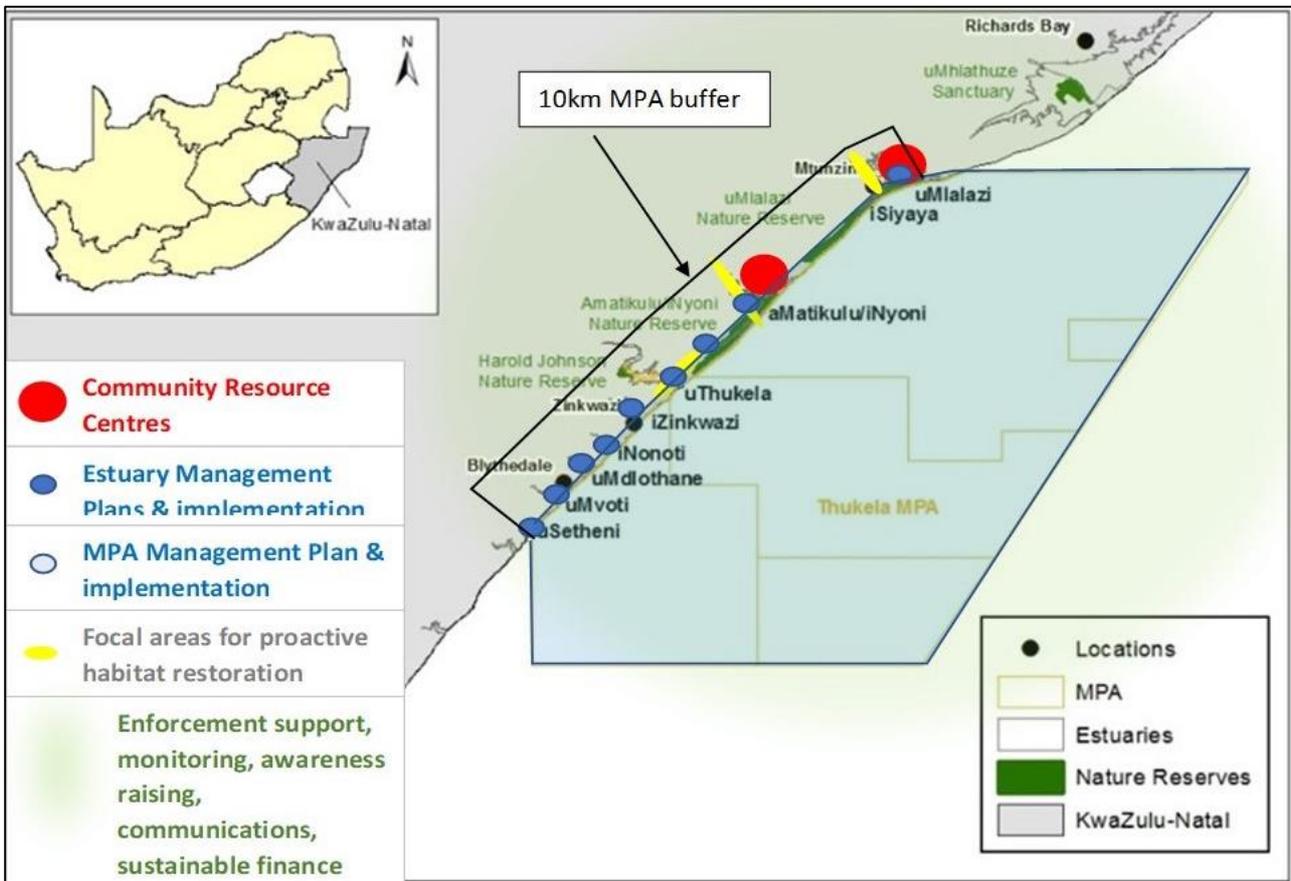


Figure 7: Geography of Primary Project Objectives

2.1.3 Project timeframe and budget

The timeframe for uThukela MPA Ecosystem-Based Management Project is five years, with a proposed start date on 01 March 2022 > to 28 February 2027. The proposed budget total for the project is €9 751 720 (including match funding).

2.1.4 Project partners and responsibilities

WILDTRUST is the lead implementing partner for this project and will report directly to the BlueAction Fund, the executing agency. Blue Action Fund receive funds from Government funding partners - Germany, through the German Federal Ministry for Economic Cooperation and Development (BMZ) in cooperation with KfW Development Bank; Sweden, through the Swedish Ministry for Foreign Affairs; France, through the Agence Française de Développement (AFD); and the Green Climate Fund (GCF).

WILDTRUST (Project lead) will work closely with our primary project partner (Sub-Grantee), the Oceanographic Research Institute of the South African Association for Marine Biological Research (SAAMBR) and the other partner organisations who, are participating and providing match funding for the project, and are integral to the project's success. The table below (**Table 2**) summarises each of these roles, as well as the other implementing partners involved and their planned contributions, to / benefits from the project. **Table 3** details the collaborating governance partners (government agencies

/ traditional structures) who will be consulted and supported through processes and workshops provided by the project.

Table 2: Partners, Sub-Grantee and Implementing Partners

Role	Organisation	Contribution to project
Project Lead Partner	WILDTRUST (WILDLANDS & WILDOCEANS)	Lead Implementing Organisation: Full project co-ordination, legal and fiduciary compliance, reporting, monitoring & evaluation, quality assurance, environmental & social impact compliance, Ocean Stewards engagements, project implementer at uThukela MPA & oversight of understanding ecosystems associated.
Primary Project Implementing Partner (Sub-Grantee)	South African Association for Marine Biological Research –Oceanographic Research Institute (SAAMBR- ORI)	Estuarine and fisheries Baseline survey and monitoring, specialist advice on restoration and methodologies, and involvement in fisheries training.
Other Implementing Partners	EKZNW Wildlife (EKZNW)	Conservation management of MPA's in the province of KwaZulu-Natal, including uThukela MPA and involving research, planning, monitoring and compliance. Priority project partner, multiple collaboration points as per Stakeholder Engagement Plan (SEP). EKZNW will be getting support from the project in the form of infrastructure, equipment, training, operative costs, vehicles, boats, etc
	Target Communities	Project beneficiaries of community hubs & restoration jobs, skills development investment and information sharing. Collaborators in development of EMP's and MPA MPs, and will receive support from the project in the form of infrastructure and training.
	South African Environmental Observation Network (SAEON)	Biophysical long-scale monitoring of oceanography, climate, water flows, etc.
	South African Institute for Aquatic Biodiversity (SAIAB) –	Provision of offshore research platforms and fish specialist advice and survey and monitoring.
	Nelson Mandela University (NMU)	Offshore coral reef restoration and baseline assessments of coral reefs as well as contribution to the social baseline study.
	University of KwaZulu-Natal (UKZN)	Social studies and baselines.

Table 3: Collaborating Governance Partners

Organisation	Contribution to the project
KwaZulu-Natal Department of Economic Development, Tourism, and Environmental Affairs (EDTEA)	Coastal Zone Management, policy, engagement with other government stakeholders in the coastal zone, Adopt an Estuary programme at one of the estuaries. Priority project partner, multiple collaboration points as per SEP. Responsible for implementation of EMPs outside MPAs.
National Department of Forestry, Fisheries and Environment (DOFFE)	Marine biodiversity and marine protected areas regulations, declarations and management implementation. DDG of Oceans and Coasts is responsible for marine protected area planning and management. Priority project partner, multiple collaboration points as

Organisation	Contribution to the project
	per SEP.
Co-operative Governance and Traditional Affairs (COGTA)	The provincial department plays a key role in ensuring cooperation between local government and traditional authorities and is also responsible for provincial spatial planning and supporting the development of IDPs and local spatial planning. To be consulted in relation to the community resource centre development and community relations.
Local and District municipalities: Mandeni Local Municipality; uMhlathuze Local Municipality; iLembe District Municipality; King Cetshwayo District Municipality.	Local and District Municipalities are responsible for development planning and control, coastal access provision, local coastal and Estuary management, environmental protection and management, and responding locally to climate change. To be included in relation to resource centre development and other relevant project developments.
Department of Water and Sanitation.	Monitoring of the potential major threats to the estuary health. The impact of poor water and sanitation services on catchment and rivers is significant and will impact on the MPA which requires consultation with DWS.
Department of Agriculture and Rural development	Climate-smart agricultural development: All legal requirements for agricultural development must be met, through this department, notably in relation to land clearing and cultivation. Development component of the project: could potentially support skills development & provide extension support.
Traditional Authorities: <i>Amakhosi and iziNduna</i>	Traditional authorities play an important role in governing land and socio-ecological relationships in the region from a community perspective; they are the first entry point to communities and will be invited to participate in all relevant participatory processes related to the project.

3. Project E&S risk management (ESMP)

3.1 Projects Environmental & Social Management Plan (ESMP) Objectives

The project's ESMP includes all of the identified environmental and social risks and impacts of the project and has been developed to outline the project's overall environmental and social risk management strategy. It is a 'living document' that will be regularly reviewed and updated by WILDTRUST in response to changes to the project description, changes in the WILDTRUST organisational structure, changes in legislation and any other guidelines and practices subscribed to, as well as changes in project design and local context.

The ESMP and appended Safeguard Instruments will be publicly disclosed documents¹ and demonstrate WILDTRUST commitment to being transparent, accountable and accepting responsibility for the potential project impacts (both positive and negative).

¹ Note that these documents will not include any personal information/ data. The ESMP and appended Safeguard Instruments, are to be maintained by WILDTRUST, and any personal data (eg. Grievance Register) will be done so in a secure manner in line with Blue Action Fund's GDPR Policy. These documents will all be available on the [Blue Action Fund](#) website.

The objectives of the ESMP are to:

- Ensure that the project operates in compliance with South Africa's legal requirements, Blue Action Fund's Environmental and Social Management System (ESMS) standards, policy and procedures, and international good practice, notably the World Bank Environmental and Social Framework (WB ESF 2017, ESS1-10), the World Bank Group Environmental Health and Safety Guidelines (EHSGs), and all of those Standards and Guidelines referred to in the Blue Action Fund ESMS Manual (Version 3, August 2021);
- Ensure that the potential negative environmental and social impacts of the project are managed appropriately, following the mitigation hierarchy;
- Ensure that the potential positive environmental and social impacts of the project are enhanced;
- Ensure that the principles of environmental and social sustainability are taken into account; and
- Provide a reference against which future monitoring and evaluation can be undertaken.

Annexed to the ESMP include three safeguards, a Stakeholder Engagement Plan (SEP), Grievance Mechanism and Process Framework. The Process Framework addresses any potential new or stronger enforced access restrictions caused by the project activities. These are further detailed in the sections below.

3.2 National legislation and International Safeguards

The project will adhere to both national legislation and international safeguards, detailed below.

National Legislation

The following list comprises the legislation most relevant and important for this project:

- South African Constitution (1996); Bill of Rights
- South African National Environmental Management Act (Act 107 of 1998) (NEMA)
- National Environmental Management: Biodiversity Act (Act 10 of 2004) (NEMBA)
- National Environmental Management: Marine Protected Areas Act (Act 57 of 2003) (NEMPA)
- Integrated Coastal Management Act 24 of 2008 (ICA)
- Promotion of Administrative Justice Act (Act 3 of 2000) (PAJA)
- Promotion of Access to Information Act (Act of 2 of 2000) (PAIA)
- Threatened and Protected Species Regulations is a chapter (Chapter 4) within NEMBA
- Marine Living Resources Act (Act 18 of 1998)
- South African National Water Act (1998)

Figure 8 presents a summary of the 'layers' of legislation that impose various regulatory and management requirements in estuaries and other parts of the coastal zone. The diagram shows at least 16 different national and provincial statutes that mandate different national, provincial and local government entities to perform specific regulatory and/or management functions in estuary zones. In

addition to national and provincial statutes, local government is responsible for preparing Integrated Development Plans, Spatial Development Frameworks and Local Area Plans (and associated policies and by-laws) that regulate development in and adjacent to coastal areas in response to identified environmental threats and priorities.

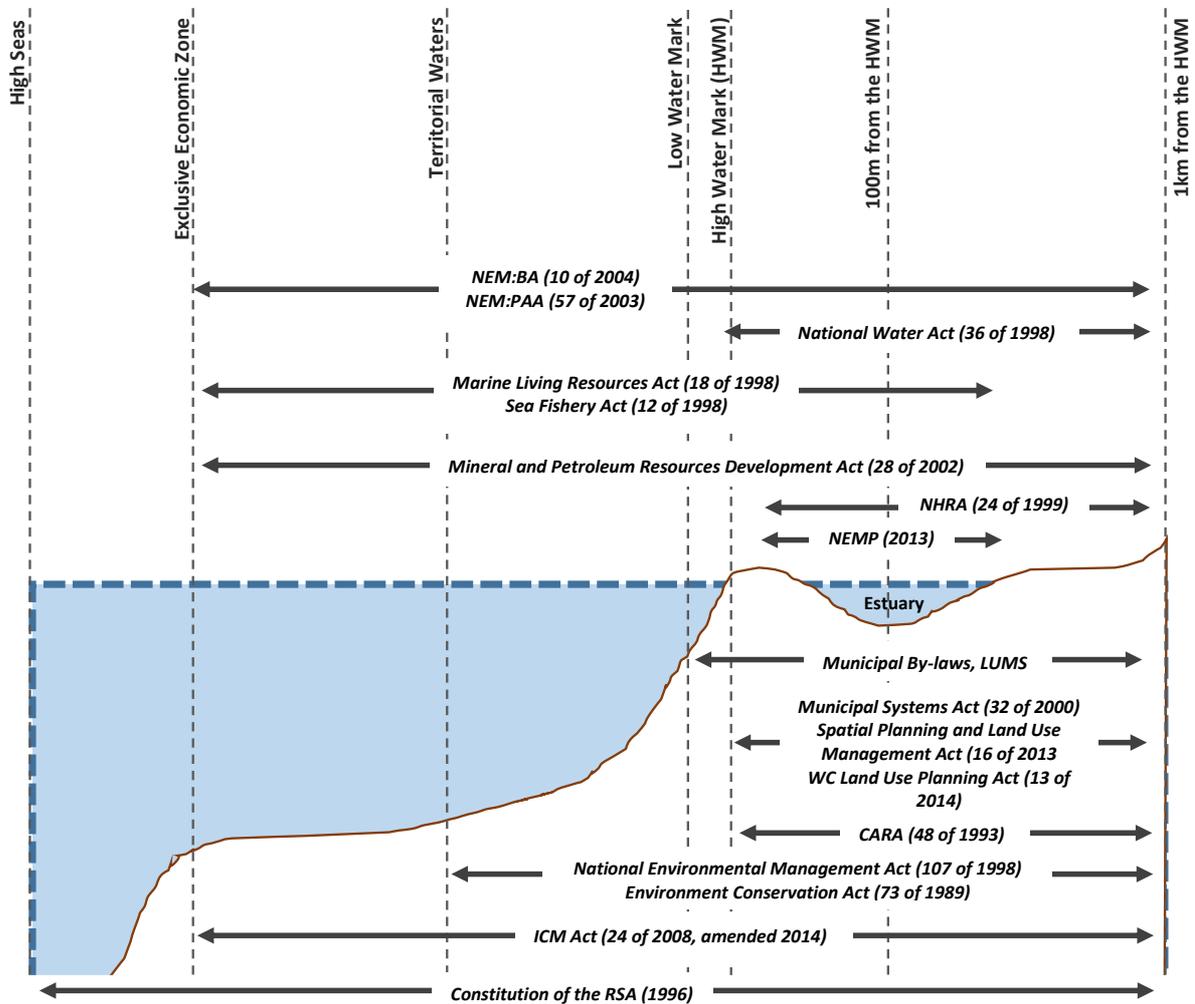


Figure 8: Summary of Legislative Jurisdiction in the Coastal Zone (from Western Cape Government, 2019, originally adapted from Goble et al. 2014)

International safeguards

The Blue Action Fund requires all of its projects to be compliant with the Standards & Guidelines detailed in **Table 4**.

Table 4: Blue Action Fund ESMS Standards & Guidelines

Title	Date	Standard/ Guideline
The World Bank Environmental and Social Framework (ESF). ESS1- 10.	2017	Standard
ILO Core Labor Standards ¹	Various	Standard

KfW Sustainability Guideline - Assessment of Environmental, Social, and Climate Performance: Principles and Process2	2021	Guideline
The World Bank Group's Environmental, Health and Safety (EHS) Guidelines, including General EHS Guidelines and Industry Specific Guidelines, as applicable.	2007	Guidelines
BMZ's Guidelines on Incorporating Human Rights Standards and Principles, Including Gender, in Programme Proposals for Bilateral German Technical and Financial Cooperation.	2013	Guidelines
"Workers' Accommodation: Processes and Standards: A Guidance Note by IFC and the EBRD"	2009	Guidelines
FAO Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (VGGT).	2012	Guidelines
FAO Code of Conduct for Responsible Fisheries (CCRF).	1995	Guidelines
FAO Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries (VGSSF).	2015	Guidelines
UN Code of Conduct for Law Enforcement Officials	1979	Guidelines
Basic Principles on the Use of Force and Firearms by Law Enforcement Officials	1990	Guidelines
The Voluntary Principles on Security and Human Rights	2000	Guidelines

Notes:

- The Voluntary Principles on Security and Human Rights (2000) has been added to the list as Good International Industry Practice (GIIP) for aspects relating to law enforcement, and the Voluntary Principles are commonly referred to as GIIP.
- The UN Basic Principles and Guidelines on Development-based Evictions and Displacement (namely §§ 42, 49, 52, 54 and 60) is referred to in the KfW Sustainability Guidelines (2021), but as Blue Action Fund does not support projects with potential for physical displacement (see Exclusion List, Chapter 2 of the ESMS), these guidelines are not included here.

These Standards are aimed at providing guidance on how to identify risks and impacts and are designed to help avoid, mitigate and manage risks and impacts as a way of doing projects in a sustainable way. To make these Standards relevant and practical for conservation projects, Blue Action Fund has developed safeguarding Principles and Requirements based on the WB ESF (Annex B of the Blue Action Fund ESMS² Manual), which include:

- **Principle 1:** Environmental and social assessment and risk management
- **Principle 2:** Stakeholder engagement
- **Principle 3:** Health, safety and security of communities and project personnel
- **Principle 4:** Protection, conservation and sustainable management of the environment, biodiversity and natural resources
- **Principle 5:** Livelihoods and access restrictions
- **Principle 6:** Gender equity and vulnerable groups

- **Principle 7:** Cultural heritage
- **Principle 8:** Indigenous Peoples
- **Principle 9:** Grievance management
- **Principle 10:** Human rights

3.3 Risk Management Strategy

The project's ESMP is provisional and will be further updated within the Project Inception period (the first six months of project implementation) in line with an update of the other Safeguard Instruments (the Grievance Mechanism, Stakeholder Engagement Plan, and Process Framework).

The project's risk management strategy aims to both manage the project's direct impacts, particularly those in the two case study estuary sites, and to support EKZNW Wildlife (the uThukela MPA management authority) to manage any impacts in the MPA across the broader area due to management plan implementation and law enforcement.

Once the ESMP has been updated after the project inception period, further major updates will be made on an annual basis, in parallel with the annual project reporting described in Section 5 below.

In this section, **Table 5** indicates the key risks and impacts identified in the E&S screening and assessment exercises conducted by WILDTRUST with partners, and **Table 6** illustrates the intervention measures included in project activities to manage these risks and impacts, including details on responsibilities and resourcing.

² For more information on the Blue Action Funds, ESMS system see: <https://www.blueactionfund.org/documents-esms/>

Table 5: Key social and environmental risk and impacts

Principles and requirements	Applicable to project? Significance of risk?	Main risks and impacts and how they will be addressed, including any Safeguard Instruments
Principle 1: E&S assessment and risk management (relates to WB ESS 1)	<input checked="" type="checkbox"/> yes Moderate risk	Based on the E&S screening and assessment completed, the project has successfully identified several potential environmental and social risks and impacts on a high-level (landscape/seascape level). These risks and impacts were related to stakeholder consultation and engagement (considering the quite complex stakeholder environment), the potential for access restrictions and social impacts on coastal communities and other marine and coastal resource users, and the potential for conflicts in relation to law enforcement in this context. To further improve the assessment of risks and impacts, the project will complete both socioeconomic and ecological baseline surveys during the first year of the project and will also include further social impact assessment in the design of the Estuary Management Plan planning process and in the MPA management plan planning processes (including impacts and opportunities from ecosystem rehabilitation work). These planning processes are detailed in the project's Process Framework. Other risks will be managed through the activities detailed in Table 6 below. The project will monitor E&S risks and impacts via the ESMP .
Principle 2: Stakeholder engagement (relates to WB ESS 10)	<input checked="" type="checkbox"/> yes Substantial risk	The project and MPA are in a complex social and political landscape, where overlapping responsibilities and mandates between different government departments and traditional authorities requires stakeholder engagement to include relevant actors. Some gaps in stakeholder consultation & engagement during the project proposal development have been identified, and a project Stakeholder Engagement Plan (SEP) has been formulated. This SEP includes engagement activities the project will undertake and activities the project will support EKZNW with.
Principle 3: Health, safety and security of communities and project personnel (relates to WB ESS 2 and 4)	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no Moderate risk	Risks identified to H&S of project staff, including WILDTRUST employees, sub-contractors and voluntary Honorary Officers, due to use of vehicles, and potential confrontations with people in the project focus areas. Risks related to law enforcement include the potential for the escalated community – MPA tensions and potential for conflict between law enforcement personnel and communities. Management measures are included in Table 6 below.
Principle 4: Resource efficiency and biodiversity (relates to WB ESS 3 and 6)	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no Low-moderate risk	Potential risks related to climate-smart agriculture (e.g. expansion into natural and sensitive areas), resource centres (e.g. siting of the Resource Centres to prevent ecological damage), and estuary restoration (e.g. introduction of inappropriate or invasive trees/ plans) have been identified. Management measures are included in Table 6 below.

<p>Principle 5: Livelihoods and access restrictions (relates to WB ESS 5)</p>	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no Moderate risk	<p>Potential for offshore areas of the uThukela MPA to lead to increased effectiveness of implementation of legal restrictions on commercial and recreational users, and for inshore areas (controlled and restricted zones) to lead to increased implementation of legal restrictions on coastal community's resource use activities, in a context where some restrictions on access already exist due to the existing MPA, Nature Reserves and other land uses (e.g. plantation forestry). A Preliminary Process Framework has been designed to guide the Project Inception period, including socioeconomic baselines and support to EKZNW's stakeholder engagement process.</p>
<p>Principle 6: Gender equity and vulnerable groups (all of the WB ESF)</p>	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no Moderate risk	<p>Potential for women and vulnerable groups to be excluded from engagement around EMPs, MPA planning, and specific project activities. Potential for women and vulnerable groups to be more adversely affected by improved implementation of legal restrictions on natural resource access, but unknown. Measures included in the Stakeholder Engagement Plan and Preliminary Process Framework to ensure inclusion during impact assessments and planning of project activities/ mitigation measures.</p>
<p>Principle 7: Cultural Heritage (relates to WB ESS 8)</p>	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no Low risk	<p>Refurbishment of Community Hubs is deemed to have a negligible potential negative impact on cultural heritage and does not require a Chance Find Procedure.</p>
<p>Principle 8: Indigenous Peoples (relates to WB ESS 7)</p>	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no Na.	<p>No applicable. The project does not consider that the coastal communities in uThukela meet the international definition of Indigenous Peoples.</p>
<p>Principle 9: Grievance Management (relates to WB ESS 10)</p>	<input checked="" type="checkbox"/> yes Moderate risk	<p>Existing grievances related to the Nature Reserves and between EKZNW and communities. Potential grievances could relate to project staff and activities (e.g. in the Estuary sites) and to the broader MPA (e.g. zoning, regulations, law enforcement). A project-level Grievance Mechanism has been designed (Annex 1), and the project will work with EKZNW to develop an MPA level Grievance Mechanism to receive and resolve those grievances that are within EKZNW's mandate.</p>
<p>Principle 10: Human Rights (relates to BMZ guidelines on Human Rights)</p>	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no Na.	<p>No identified risks or impacts to date.</p>

Table 6: Risk and impact management measures

Social and environmental risks and impacts	Management measures	Feasibility, effectiveness, and sustainability	Location	Costs	Implementation responsibility	Schedule
<p>Principle 1 - E&S risk and impact identification, assessment, and management– risk of unidentified and unmanaged impacts due to the project & project contribution to the MPA; some gaps in stakeholder consultation (language, access to meetings, information sharing, involvement in management planning).</p>	<p>1) Annual re-screening of risks and impacts using the BAF E&S tool [ESMS function]</p> <p>2) Project socioeconomic baseline; two estuarine sites and directly affected communities (see Annex 3 of the project proposal for details);</p> <p>3) Inclusion of impact assessment (and mitigation planning) into the EMP planning process; see Process Framework</p> <p>4) Inclusion of impact assessment into the MPA stakeholder consultation and engagement process; Process Framework</p> <p>5) Support for uThukela MPA Stakeholder Forum and Estuary Advisory Forums including local stakeholders and expertise, to work on key identified access-livelihood issues within the MPA; Process Framework</p> <p>6) Monitoring and Evaluation of the project ESMP; [ESMS function]</p>	<p>1, 2 and 6 are all project activities, and ESMS functions that will be overseen by the ESMS Manager and are written into the project work plan (ie. within project control). Measure 3 to be integrated into ToR of EMP consultants. Measures 4, 5 and 7 will be supported by the MPA authority (EKZNW). WT works closely with the social ecologist of EKZNW, who is the point contact for safeguards.</p>	<p>MPA level</p>	<p>1) ESMS Manager Time; 2) Baseline budget; 3) EMP consultant TOR; 4) Travel, S&T, staff time; consultant TOR 5) Stakeholder Engagement Coordinator and Assistant and the 2 Hub supervisors time costs; Meeting costs 6) ESMS Manager time & running costs</p>	<p>1) WILDTRUST; 2) WILDTRUST and University of KwaZulu Natal; 3) WILDTRUST supervision; consultants conducting EMP planning. 4-5) EKZNW with support from WILDTRUST; 6) WILDTRUST; 7) EKZNW with support from WILDTRUST.</p>	<p>1) Annual 2) Inception Phase 3) Inception Phase 3) Before & during EMP planning process; 4) Before & during MPA planning process; 5) Inception Phase; 6) Ongoing with annual reporting; 7) Ongoing</p>

Table 6: Risk and impact management measures

Social and environmental risks and impacts	Management measures	Feasibility, effectiveness, and sustainability	Location	Costs	Implementation responsibility	Schedule
	7) Support to socioeconomic component of uThukela ongoing monitoring and research programmes; [ESMS function];			7) EKZNW & project staff time and running costs.		
<p>Principle 2 - Stakeholder engagement for the broader MPA requires</p>	<p>Project SEP, including:</p> <ol style="list-style-type: none"> 1) Support EKZNW with a stakeholder analysis and formulation of an initial uThukela MPA Stakeholder Engagement Plan; 2) Facilitate the establishment of identified mechanisms/ forums (see SEP), including a multi-level governance structure; 3) Design a project presentation and a note with relevant project information for project disclosure; 4) Establish and activate a Project Partners Committee to allow multi-lateral discussions about the project (traditional authorities; local/provincial government) 5) Engage translation services for translation of all key MPA documents into isiZulu; translation of all relevant project information, and ongoing translation of project and MPA documents to support stakeholder engagement; 6) Formulate community engagement principles and participatory recommendations to be used in community engagement for the MPA and EMP 	<p>All well within the feasibility of WILDTRUST and partners to coordinate. Multi-level governance structure will depend on levels of engagement from partners. Sustainability will be determined by partners finding value in the processes.</p>	<p>MPA and national level</p>	<ol style="list-style-type: none"> 1) Meeting costs and staff time 2) Workshop, (venue, catering) costs 3) N/A 4) Meeting costs 5) Translation budget 6) ESMS manager and PM time 7) ESMS manager time 8) Project team Travel & S&T 9) Workshop costs and staff time. 	<ol style="list-style-type: none"> 1) WILDTRUST, EKZNW 2) WILDTRUST and Multiple stakeholders (as per SEP) 3) WILDTRUST 4) WILDTRUST, EKZNW, Local Gov, Community Leadership Representative) 5) UKZN 6) WILDTRUST (ESMS Manager & Project) 7) WILDTRUST (ESMS Manager) 8) WILDTRUST (PM) 9) WILDTRUST, EKZNW 	<ol style="list-style-type: none"> 1) Inception phase 2) Inception Phase 3) Inception Phase 4) Inception phase and monthly / bi-monthly meetings thereafter 5) As Needed 6) Inception phase 7) Inception Phase 8) Throughout project 9) Throughout project

Table 6: Risk and impact management measures

Social and environmental risks and impacts	Management measures	Feasibility, effectiveness, and sustainability	Location	Costs	Implementation responsibility	Schedule
	<p>planning process to ensure the voice of youth, women, and any identified vulnerable affected user groups.</p> <p>7) Provide training in the application of the community engagement principles, and participatory processes, gender-based violence and sexual harassment to key Ezemvelo and WILDTRUST staff leading on stakeholder engagement.</p> <p>8) Provide extension support to EKZNW to support stakeholder engagement efforts and to ensure consultation extends beyond community representatives (eg. traditional leadership) and reaches community members & affected resource users, among others.</p> <p>9) Sensitisation events (see Principle 10 – law enforcement) to communities tailored to zoning/ regulations in surrounds.</p> <p>10) Specific stakeholder engagement focused around 4 estuaries that fall outside our 2 main project area's to explain the reason for the intensive focus on the priority project sites, and to explain how the project will be contributing to livelihoods in these sites.</p>					

Table 6: Risk and impact management measures

Social and environmental risks and impacts	Management measures	Feasibility, effectiveness, and sustainability	Location	Costs	Implementation responsibility	Schedule
<p>Principle 3 - OHS risk and impacts to project staff including WILDTRUST employees, subcontractors and voluntary Honorary Officers</p>	<p>1). WILDTRUST vehicle policy (including boats); 2). H&S training for Vehicles and Boat Operations. 3). Environmental & Social Code of Practice (ESCAP) for resource Centre construction (labour, H&S) [ESMS function]; 4). Honorary Officer Standard Operating Procedure (SOP) (as below in law enforcement).</p>	<p>Dependent on active implementation of policies. But for both WILDTRUST and EKZMW these are well regulated at organisational level supported by both good practice and OHS legislation.</p>	<p>Organisational</p>	<p>N/A</p>	<p>WILDTRUST & EKZMW</p>	<p>N/A</p>
<p>Principle 3 – Local conflicts due to employment opportunities and selection process</p>	<p>1) Inclusion of Traditional Authority leadership and the Councilors in selection criteria generation for employment opportunities 2) Broad and appropriate advertising of employment opportunities.</p>	<p>Dependent on strong relationships with Community Leadership, based on trust, and TA’s time availability. Because of the high need for jobs in communities, we don’t foresee any challenges here.</p>	<p>MPA level.</p>	<p>Staff time, travel, S&T</p>	<p>WILDTRUST, TA leaders and counsellors.</p>	<p>Throughout the project (during recruitment)</p>
<p>Principle 4: Resource efficiency and biodiversity</p>	<p>Climate-smart agricultural development: risks of unintentional damage to sensitive natural areas 1) WILDTRUST to include the selection of areas for climate-smart agriculture from results of ESA, E&S Development Tool and in the EMP process.</p>	<p>All skills for implementation and sustainability within WILDTRUST and partners.</p>	<p>MPA level</p>	<p>1) Project team time 2) ESMS Manager and consultants time</p>	<p>WILDTRUST, Consultants</p>	<p>1) Inception Phase, and during EMP development. 2) As per project</p>

Table 6: Risk and impact management measures

Social and environmental risks and impacts	Management measures	Feasibility, effectiveness, and sustainability	Location	Costs	Implementation responsibility	Schedule
	<p>2) ESCOP for the resource centre’s capturing Occupational Health & Safety (OHS) risks/impacts and the environmental impacts listed in the E&S assessment.</p> <p>3) Fuel management protocols implemented;</p> <p>4) An Environmental Management Plan to be implemented for all construction and operational activities associated with the community resource centre’s and other facilities/infrastructure built/used by the project;</p> <p>5) Estuarine and riparian restoration – expertise on this existing within WILDTRUST – so there is no risk of introducing any alien species or damaging natural areas through inappropriate methodologies etc.</p> <p>6) WILDTRUST to formulate management measures based on the ESA report/ results in the E&S development tool.</p>			<p>3) EKZNW staff time</p> <p>4) Project manager time, Consultant time & S&T</p> <p>5) Restoration team staff time</p> <p>6) Project Team time</p>		<p>activity timeline</p> <p>3) Year 1 – before delivery of LE equipment.</p> <p>4) Year 1 before implementation of relevant project activity.</p> <p>5) Year 1</p> <p>6) Year 1</p>
<p>Principle 5: Access and livelihoods. Risks/ impacts related to offshore, inshore zones</p>	<p>A Preliminary Process Framework. Management measures are those included in Principle 1 and 2 (inclusion of impact assessment in MPA and EMP planning process, formation of technical working</p>	<p>Risk of mitigation measures required by PF outcomes outside of budget and human</p>	<p>MPA level</p>	<p>1) ESMS Manager and staff time</p>	<p>WILDTRUST, EKZNW.</p>	<p>1) Inception Phase</p> <p>2) Inception Phase</p>

Table 6: Risk and impact management measures

Social and environmental risks and impacts	Management measures	Feasibility, effectiveness, and sustainability	Location	Costs	Implementation responsibility	Schedule
<p>of the MPA, existing Nature Reserves, and cumulative impacts on vulnerable resource users.</p>	<p>groups on access-livelihood issues, MPA stakeholder engagement process etc.). Furthermore, additional management measures include:</p> <ol style="list-style-type: none"> 1) Identification of the most natural resource-dependent social groups (e.g. Natural Resource user groups) most likely to be most affected by law enforcement during EMP planning (e.g. uThukela Estuary). Those groups who do not form part of the two main livelihoods support centre's will be provided with support through: <ol style="list-style-type: none"> a. Network building and WILDTRUST serving as a bridge to other opportunities b. Learning exchanges with two priority sites. c. Identification of livelihood options during EMP process d. Access to other priority site hub sites at the community's own cost. e. Restoration activities at and around the uThukela and Zinkwazi estuaries that will provide local jobs and training. <p>These groups will also be consulted in the Projects Inception phase to ensure there</p>	<p>resources capacity of the project.</p>		<p>(WT & EKZNW) 2) Workshop costs, staff S&T</p>		

Table 6: Risk and impact management measures

Social and environmental risks and impacts	Management measures	Feasibility, effectiveness, and sustainability	Location	Costs	Implementation responsibility	Schedule
	<p>is understanding of the reasons for not running full livelihood interventions in these sites.</p> <p>2) Workshop with EKZMW to investigate the findings of the ESA/ Process Framework regarding restrictions and identify where further assessment and stakeholder engagement is required; (PROJECT INCEPTION period);</p> <p>See also activities 1-3 in the SEP section (1) Inclusion of impact assessment (and mitigation planning) into the EMP planning process; see Process Framework; (2) Inclusion of impact assessment into the MPA stakeholder consultation and engagement process; Process Framework; (3) Formulation of Stakeholder Forum working groups including local stakeholders and expertise, to work on key identified access-livelihood issues within the MPA; Process Framework.</p> <p>In addition, livelihood development measures are included in the project. Further engagement with affected groups is required to ensure these are suitable mitigation measures, and these would</p>					

Table 6: Risk and impact management measures

Social and environmental risks and impacts	Management measures	Feasibility, effectiveness, and sustainability	Location	Costs	Implementation responsibility	Schedule
	<p>include the "Sustainable Livelihood Initiatives" (indicator 5.1), including:</p> <ul style="list-style-type: none"> 5.1.1 Baseline livelihoods and Perceptions Survey and reassessment 5.1.2 Identification of potential livelihood initiatives 5.1.3 Community eco-cultural tour guide livelihood initiative 5.1.4 Community-run campsites 5.1.5 Support for communities not at focal site <p>And activities on Women's leadership and economic empowerment (Indicator 5.2), including:</p> <ul style="list-style-type: none"> 5.2.1 Development of Gender Action Plan for the Project 5.2.2 Leadership training 5.2.3 Enterprise development training 5.2.4 Micro-enterprise establishment 5.2.5 Peer support groups <p>Furthermore, in relation to opportunities for youth:</p> <ul style="list-style-type: none"> 5.3.1 Climate adaptation youth job creation and skills micro-enterprise development 5.3.2 Career development support <p>In relation to climate resilience:</p> <ul style="list-style-type: none"> 5.3.3 Ocean Stewards career development and support 					

Table 6: Risk and impact management measures

Social and environmental risks and impacts	Management measures	Feasibility, effectiveness, and sustainability	Location	Costs	Implementation responsibility	Schedule
	<p>At the 2 focal sites, climate adaptation activities will include:</p> <ul style="list-style-type: none"> 5.4.1 Community Climate Adaptation Resource Centre/hubs 5.4.2 Training, awareness and education 5.4.3 Demonstration of climate-smart homestead-based solutions 5.4.4 Promote sustainable resource use practices and reservation of important natural cultural sites. 					
<p>Principle 6: Gender & vulnerable groups. Women and vulnerable groups are least able to participate in decision-making re. the MPA and EMP; potential for these groups to be adversely affected by access restrictions unknown.</p>	<p>The project socioeconomic baseline (Baseline livelihoods and Perceptions Survey and reassessment) will include the identification of vulnerable groups in the selected Estuary Sites. The stakeholder engagement and impact assessment (see measures in Principle 1 & 2) will ensure the inclusion of vulnerable groups.</p> <p>In relation to gender, the Community Engagement Protocol referred to in Principle 2, will include guidance on engaging with women, youth and vulnerable groups in the project's community work, including impact assessment. The project has a number of women-focused activities listed in Principle 5 above.</p>	<p>Limited by cultural norms and gender identities in project site. We need to take care not to be disruptive and disrespectful of these while still trying to integrate best practice. Project platforms, staff understanding of these cultural norms will enable this. Sustainability is dependent on each communities receptiveness and individual realisation.</p>	<p>MPA level</p>	<p>1) ESMS Manager Time and Gender specialist time</p>	<p>WILDTRUST, Gender specialist.</p>	<p>1) Inception Phase & throughout project.</p>

Table 6: Risk and impact management measures

Social and environmental risks and impacts	Management measures	Feasibility, effectiveness, and sustainability	Location	Costs	Implementation responsibility	Schedule
	Development of Gender Action Plan in Inception Phase of the project.					
Principle 9: Grievance management. Existing grievances and new potential grievances.	<ol style="list-style-type: none"> 1) Translate the grievance mechanism (pre-project); 2) Pre-cursory consultations with affected communities to decide the most appropriate mechanism(s) for submission of grievances. 3) Project Grievance Mechanism to be implemented as written; 4) Project support to EKZNW to design and develop an MPA-level Grievance Mechanism that would allow community members to report grievances. 	All within the scope of WILDTRUST and project partner. Sustainability of MPA level grievance mechanism implemented by EKZNW committed. Possibility of future application in other regional MPA's.	MPA level	<ol style="list-style-type: none"> 1) – 4) Translation costs, ESMS manager Time, EKZNW staff time, meeting costs, S&T 	WILDTRUST, EKZNW, Stakeholders	1) – 4) Year 1
Principle 10 - Law Enforcement (LE). Risk to Rangers and Honorary Officers when confronting individuals or groups practicing illegal activities; risks to community members of misuse of force.	<ol style="list-style-type: none"> 1) Honorary Officers (HO) Standard Operating Procedure (SOP) cross-check needed (8) and then need to ensure there is supervision in place for HOs; for training to be at the level that HOs are fully comfortable with the procedures, legislation, rules and regulations, zones etc.; and Include emphasis on human rights, and consider incorporation of gender-based violence issues. (eg. when working, when informing) and human rights and community – MPA relations. Reference is made to a “General Code of Conduct” (and KZN's wildlife code of conduct) for working 	EKZNW is committed to best practices, so don't foresee challenges. Delays may be caused in the implementation of gaps identified in Law Enforcement as this has organisational-level implications.	MPA Level	<ol style="list-style-type: none"> 1) Trainer time, workshop costs, S&T, Staff time 2) Consultant time, staff time 3) Workshop costs, staff time, S&T 4) Design, printing and signage 	<ol style="list-style-type: none"> 1) WILDTRUST, Consultants, EKZNW. 2) WILDTRUST, PPC members and EKZNW 3) WILDTRUST 4) WILDTRUST, EKZNW 5) WILDTRUST, EKZNW, HO's 6) WILDTRUST 	<ol style="list-style-type: none"> 1) Year 1 (before delivery of LE equip) 2) Inception phase 3) Year 1-Year 5 4) Inception phase 5) Year 1 (before

Table 6: Risk and impact management measures

Social and environmental risks and impacts	Management measures	Feasibility, effectiveness, and sustainability	Location	Costs	Implementation responsibility	Schedule
	<p>under the banner of the MPA. If this exists and is suitable, this could be used, or if it needs to be developed, the project would support this.</p> <p>2) Implementable Law enforcement strategy to address any local LE tensions by Project Partners Committee (PPC).</p> <p>3) Community sensitisation on the zonation and regulations within the MPA and existing Nature Reserves are built into the Hub awareness activities and into the MP stakeholder engagement process (recognising that the engagement process should allow for potential changes in relation to the specifics of access restrictions (such as species harvested) within the bounds of published legal regulations if it is to be effective; otherwise, it is 'information sharing' or at best 'consultation').</p> <p>4) Updating of signage to include isiZulu and easily accessible information.</p> <p>5) HO training on the zoning, regulations, SA legislation, human rights, community relations, and conflict resolution.</p> <p>6) Consider the development of the Process Framework to consider gill netters, traditional medicine collectors, and other natural</p>			<p>erection costs, S&T for site visits for placement</p> <p>5) Trainer costs, workshop costs, S&T</p> <p>6) ESMS manager time, stakeholder consultation – S&T</p> <p>7) Meeting costs, possibly S&T (if in-person meeting needed).</p> <p>8) Consultant time</p>	<p>7) WILDTRUST, SEWG, PPC.</p> <p>8) WILDTRUST, Consultants</p>	<p>delivery of LE equip)</p> <p>6) Inception phase</p> <p>7) Year 1-Year 5</p> <p>8) Inception phase</p>

Table 6: Risk and impact management measures

Social and environmental risks and impacts	Management measures	Feasibility, effectiveness, and sustainability	Location	Costs	Implementation responsibility	Schedule
	<p>resource users, and inclusion of potential for avoidance (e.g. if an activity is culturally or socially important and cannot be 'restored').</p> <p>7) Community – As part of the Stakeholder Engagement Working Group (SEWG) and Project Partner Committee (PPC) any existing relationship issues between the community and Ezemvelo will be addressed to provide systemic support for EKZNW is addressing these.</p> <p>8) Review of KZN SOPs and alignment with 1) Voluntary Principles on Security and Human Rights; 2) United Nations Code of Conduct for Law Enforcement Officials; 3) Basic Principles on the Use of Force and Firearms by Law Enforcement Officials. Discuss and gaps with EKZNW.</p>					

3.4 Implementation Roles & Responsibilities

WILDTRUST will manage the implementation of the Blue Action Fund ESMS, Project ESMP and associated Safeguard Instruments throughout project implementation. In addition, WILDTRUST will have either direct responsibility for the implementation of all management measures and mitigation activities or will clearly delegate this responsibility to project partners indicated in **Tables 2 and 3**.

Furthermore, WILDTRUST and its implementation partners will be responsible for implementing the monitoring programmes required to verify that the management measures are achieving their expected results. WILDTRUST will be responsible for the disclosure of relevant project information to identified stakeholders. Finally, WILDTRUST will work closely with the relevant South African government authorities and third-party organisations to initiate necessary capacity building and community development actions.

Responsibility for the implementation of the ESMP, Safeguard Instruments and Blue Action Fund's ESMS falls under the responsibilities of numerous levels and functions in WILDTRUST organisation, including senior management, with the Organisational Resilience Department. This department is a core function that services both the WILDOCEANS and WILDLANDS programmes and is guided by the CEO and two Executive Directors covering operational and programmatic functions.

All ESMS requirements of the project will be coordinated by the ESMS Manger and implementation responsibility held jointly between the ESMS Manager and the Project Manager. Key support roles include the projects Stakeholder Engagement Manager and key staff at EKZNW in the social ecology and park management units.

Further detail on the accountabilities, reporting lines and responsibilities of key staff members in relation to ESMS and this ESMP will be updated during the first six months of project implementation.

4. Stakeholder Engagement Plan

The Blue Action Fund and the WILDTRUST are committed to complying with the national and international stakeholder engagement and disclosure requirements. The Stakeholder Engagement Plan (SEP) is to demonstrate how uThukela MPA Ecosystem-Based Management Project has engaged with stakeholders during project design and the proposed stakeholder engagement process that will be followed during the project's planning and implementation.

4.1 Purpose of the Stakeholder Engagement Plan

The overall aim of the SEP is to ensure that a timely and appropriate approach is taken to engagement with stakeholders. The SEP outlines how the project will further engage the various stakeholder groups

throughout project design and implementation in order to ensure that their views and concerns are heard and taken into account. The purpose of having a SEP is, therefore, to:

1. Ensure a successful and sustainable project, and alignment of the project with international good practice approaches to stakeholder engagement, including the World Bank Environmental and Social Framework (WB ESF 2017), particularly Environmental and Social Standard 10 (ESS10);
2. Identify and analyse stakeholders during the project design, listing all relevant stakeholders and analysing each in relation to their potential interest in and influence on the project, as well as the project's potential impact (positive and negative) on them;
3. Guide the process of working directly with the stakeholders and, in particular, the Project Affected Peoples, throughout project implementation to ensure that public concerns and aspirations are consistently understood and considered by WILDTRUST;
4. Actively obtain input from a broad spectrum of stakeholders at local, regional, national and international levels, with particular emphasis on Project Affected Peoples, through meaningful consultation;
5. Give Project Affected People a sense of ownership and/or a stake in the decision-making process about the project, thereby allowing the project to gain and maintain a social licence to operate and to grow;
6. Help with managing expectations of the Project Affected People and other stakeholders from the beginning of the project and throughout implementation, thereby ensuring that any expectations are realistic and factually informed;
7. Provide stakeholders with adequate, clear, timely and consistent information
8. Document all stakeholder activities for the project regarding the Project and project activities, including impacts and opportunities that may arise and proposed management measures/solutions, as well as the manner in which they can participate in this process;
9. Provide sufficient opportunity for stakeholders to raise issues, make suggestions and voice their concerns and expectations with regard to the project;
10. Build capacity among stakeholders to enhance their ability to interpret the information, as well as to contribute their issues of concern and suggestions for enhanced benefits; and
11. Provide stakeholders with timely feedback on whether and how their inputs were incorporated into project decisions, particularly relating to management measures and strategies for enhancing benefits and including the effective and timely management of any grievances related to the project.

4.2 Identified Stakeholders

During the concept design phase, stakeholders have been identified through various means, including through, e.g., key informants, meetings, interviews, workshops and liaison with Affected Community leaders, local Non-Governmental Organisation (NGOs) and government authorities. Stakeholder identification is an ongoing process and will be reviewed and updated regularly as project implementation proceeds. Potential project stakeholders identified are recorded in an electronic Stakeholder Database (available on request). Identified stakeholders are listed below in **Table 7**.

Table 7: Stakeholder List

GROUP OF STAKEHOLDER	STAKEHOLDER
1. Owners and users of land and marine area	<p>1.1 Individuals, legal entities, local administration holding land title documents</p> <ul style="list-style-type: none"> • Community traditional leadership and local counsellors in South Africa • People and Park Programme (DFFE) entity representing land claimants and communities) • Tronox mine • Elan property group • Mtunzini Residents Association • North Coast ratepayers • Local townfolk at small towns immediately adjacent to the MPA and estuaries, including Tugela Mouth. <p>1.2 Tenants or occupiers without formal rights</p> <ul style="list-style-type: none"> • Community members occupy traditional communal land in South Africa at the discretion of the local Chief ("Induna"). While these individuals do not hold title deeds to land, their rights are considered "formal" under traditional laws in South Africa. <p>1.3 Land users (grazing, farming or other activities)</p> <ul style="list-style-type: none"> • MPA users, community members, local fishers, hospitality industry and tourism operators, angling clubs (Zinkwazi Ski-boat club, uThukela Ski-boat club, Amatikulu Ski-boat club, Lobotes Ski-boat club, and Blythedale Ski-boat club, uMhlali ski-boat club, uMlalazi Ski-boat club), uMvoti Angling club small-scale shore Line- fishers, small-scale Intertidal Invertebrate harvesters, offshore sport line-fishers, shore-based sport line fishers, sport spear-fishers, recreational divers, private lodge owners, charter boat (fishing) commercial fishers, and commercial line fishers, Northern KZN line fishers, Mthunzini fish farm, Natal deep-sea angling association, prawn fishery development association, recreational angling, Tightline fisheries, Viking fishing, Durban Seine Netters, Prawn fisheries and development association, • SA Spearfishing, Horap Sea Ventures, Sea Harvest cooperation, Sprayfishing, Zululand kayak club, Horap sea ventures, other tour operators, visitors to terrestrial parks, e.g. Umlalazi Nature Reserve • Mondi, Tongaat Hullett, Blythedale coastal resort
2. Local population	<p>2.1 Inhabitants of the project-affected areas</p> <p>Community members from the following communities: Amatikulu, Mhlubulweni, Mangeza, Harold Johnson Nature Reserve, Nyathini, Sundumbili, Zinkwazi, Darnall, Port Dunford/Nyembe, Mtunzini, Mahunu, Ongoye, Sikhalsenkosi, Vulindlela, Khandisa, Esikhawini (3 separate wards: 17,20, 21), Obanjani, Gingindlovu, Nguqu.</p>
	<p>2.2 Residents located near the Project location</p> <p>To be identified in project implementation.</p> <p>2.3 Residents of settlements located near roads used for transporting materials during construction</p> <p>To be identified in project implementation.</p> <p>2.4 Indigenous groups</p> <p>N/A</p>

<p>3. Administrative bodies and authorities</p>	<p>3.1. National authorities</p> <ul style="list-style-type: none"> • Department of Forestry, Fisheries and Environment (DFFE) • South African National Biodiversity Institute (SANBI) <p>3.2. Regional authorities (district-level government authorities)</p> <ul style="list-style-type: none"> • Ezemvelo KZN Wildlife • KZN Department of Economic Development, Tourism and Environmental Affairs (EDTEA) • Department of Cooperative Governance and Traditional Affairs (COGTA) <p>3.3. Local authorities</p> <ul style="list-style-type: none"> • Local Government municipalities <ul style="list-style-type: none"> - KwaDukuza Municipality, - Ilembe Municipality, - uMhlathuze Municipality - Mandeni Municipality • Community leadership in all the community sites: <ul style="list-style-type: none"> - EMacambini Traditional Council - Mkhwanazi Traditional Authority - Nzuzu Traditional Council - Nonoti Traditional Council - Ogagwini Traditional Council • Local authorities in all the community sites • Government counsellors or representatives in all the community sites
<p>4. Research, NGOs and independent experts</p>	<p>4.2. Scientific organisations & research</p> <ul style="list-style-type: none"> • Oceanographic Research Institute (ORI) • The South African Institute for Aquatic Biodiversity (SAIAB) • Nelson Mandela University • South African Environmental Observation Network (SAEON) • University of Zululand • University of KwaZulu-Natal • Youth networks: Ocean Stewards (marine and social science students); Youth for MPAs, Youth for Sharks

	<ul style="list-style-type: none"> • CSIR • Marine & Estuarine Research (MER) • Coast Wise • Rhodes University <p>4.2 NGOs KZN Conservancies Association (KZNCA) /Conservation KZN, Various individual conservancies (e.g. Zinkwazi Blythedale Conservancy), Wildlife and Environment Society of South Africa (WESSA), Coast Watch KZN, Masifundise, Coastal Links, SDCEA, Green Connection</p> <p>4.3 Experts on a national and international level (scientific collaborators) Dr Jean Harris, Dr Jennifer Olbers, Dr Toufiek Tsamaai, Ryan Palmer, Dr Anthony Bernard, Dr Cathy Sutherland, Prof Mandy Lombard, Dr Bernadette Snow, Fiona MacKay, Dr Tommy Bornman, Karen Sack</p>
5. Media	<p>5.1. Print media (full list held by the project lead) e.g. North Coast Courier, Mercury, Sunday Tribune, Ballito Life & Style</p> <p>5.2 Radio, TV e.g. SAFM, East Coast Radio, 88FM Ballito</p> <p>5.3. Internet sources e.g. News 24, and WILDTRUST websites and online social media platforms</p>
6. Organisations involved in Project implementation	<p>6.1 Construction and design companies involved in implementation of the project The Sight Seekers (Creative Design Company) Construction companies to be identified in project implementation</p> <p>6.2 Company staff WILDTRUST Executive, WILDTRUST HR and Finance Teams and WILDOCEANS Project and Marketing Teams</p> <p>6.3 Contractors and contractors' staff To be identified in project implementation</p>
7. Specific vulnerable groups who may be impacted by the project.	<p>7.1 People with difficulty in engaging with the stakeholder consultation process</p> <ul style="list-style-type: none"> • People living far away from the project meeting sites e.g. itinerant fishers People with no transport/funding for transportation • People who cannot leave work for scheduled stakeholder engagement processes <p>7.2 People with special vulnerability due to physical disability, social, political or economic standing, legal status, limited education, lack of employment or housing</p> <ul style="list-style-type: none"> • People reliant on the newly proclaimed MPA for livelihood support. e.g. illegal gillnet fishers. • Women and child-headed households living below the poverty line. • People with disabilities. Unemployed youth and adults. • Small Scale fishers (Wandu, Tugela Mouth, Isiphethosohwebede) • Recreational fishers • Defined geographical groups to be identified during the Baseline in the Inception Phase of the project.

Vulnerable Groups

Disadvantaged or vulnerable groups are individuals or groups of individuals who risk being disproportionately affected by project-related risks and adverse impacts and who may be more limited than others in their ability to take advantage of project benefits. These social groups can suffer from discrimination, unequal access to rights, unequal access to and control over resources or unequal access to development opportunities. As a result, they may be poorly integrated into the formal economy, may suffer from inadequate access to basic public goods and services, and may be excluded from political decision-making. Disadvantaged or vulnerable individuals/ groups are also more likely to be excluded from/ unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so.

Vulnerability in this context refers to people who are:

- Likely to be affected by the project (i.e., they are exposed to project activities, e.g., because they fish or use areas where law enforcement will occur);
- Sensitive to these effects (e.g., because they are highly dependent on natural resources with no other livelihood options); and
- Have got low adaptive capacity (e.g., because they don't have family or relatives who can support them, or no other skills or assets to rely on).

In the case of disadvantaged and vulnerable groups, WILDTRUST has to ensure that they are duly and timely consulted, making sure that their concerns are heard, taking into account individuals' and communities' specificities, and delivered in an appropriate form, manner and language. In some cases, special efforts will be made to ensure that disadvantaged or vulnerable members have access to consultation events or discussion forums. As with other stakeholder groups, the type of engagement should be commensurate to the potential level of risks/ impacts associated with the project.

Vulnerable groups in the uThukela MPA include Small-scale fishers (roving cast-off's, co-operatives and subsistence), coastal resources user communities (local), recreational fishers/boating clubs (District and provincial level), Commercial Fishers (offshore), small-scale fishers (shore) and other vulnerable and marginalised groups such as illegal gillnet fishers and people living in poverty.

Individual consultations will be arranged where needed, for example, with the illegal gillnet fishers to promote understanding and address alternative livelihood options. We will ensure to consider any constraints to participation for identified disadvantaged or vulnerable groups such as times of meetings, place of meeting (assisting with transport if needed or meeting in a place that is convenient for them). We will ensure that translation into Zulu is always available where needed, and information is explained in a way that is culturally appropriate and easily understood. Details of the approach will be identified in the Baseline surveys in the Project's Inception Phase.

4.3 Summary of Past and Planned Project Stakeholder Engagement

4.3.1 Past Stakeholder engagement

The stakeholder engagement process for this project started in the concept development phase, initially with the relevant government authorities, scientific institutions and NGO's. In the full proposal development, these engagements continued in workshops, meetings and interviews with key informants knowledgeable about the project site, including representatives from across the spectrum of environment and people interests. We also expanded this engagement to include the broad spectrum of stakeholders in the uThukela area, including fisher communities, local municipalities, industry, the broader scientific community and others. This process was made more complicated by the fact that our National Department of Environment, Forestry and Fisheries (DEFF) and their designated management authority, Ezemvelo KZN Wildlife (EKZNW), had not yet held MPA initiation meetings with local stakeholders at the time of the project proposal preparation. This project proposal prompted and facilitated the initiation of the first stakeholder engagement workshop since the designation of the MPA. This workshop was attended by DFFE and EKZNW and served to disseminate information about the new MPA. It also revealed that there are still some steps to be completed by DEFF to fully inform stakeholders about the MPA and to generate full support for the MPA from all stakeholders. This was particularly evident for the adjacent rural communities for whom it is challenging to gain access to information and access current stakeholder engagement platforms.

4.3.2 Planned Stakeholder engagement

The following preliminary stakeholder engagement mechanisms have been identified/created to enable the intentions of the project for robust and effective stakeholder engagement.

Table 8: Preliminary Stakeholder Engagement Mechanisms

Stakeholder Engagement Mechanism	Lead by	Other participants
MPA Stakeholder Forum	EKZNW	WILDTRUST, various MPA stakeholders to be defined in the Stakeholder Forum ToR. Includes representatives of project affected people.
Information sessions with affected rural communities	WILDTRUST	EKZNW, to ensure appropriate access to information in mother tongue, to empower community members and representatives to effectively engage at MP consultations and the MPA Stakeholder Forum
MPA Management Plan Finalisation consultations	EKZNW	WILDTRUST; all project-affected communities and people; those stakeholders marked as Informed Consultation and Participation in the SEP

Stakeholder Engagement Mechanism	Lead by	Other participants
Estuarine Management Forum	EDTEA	WILDTRUST, EKZNW, various MPA stakeholders, including representatives of project affected people in Estuary areas.
Baseline livelihoods and Perceptions Survey and reassessment and feedback	WILDTRUST / UKZN	Community Households in two focus Estuaries and Restoration and EMP sites.
Multi-level Governance Forum	EKZNW	DFFE, EDTEA, COGTA local government and WILDTRUST (possibly as secretariate)
Stakeholder Working Group	WILDTRUST (SE Manager)	WT Community liaison staff, EKZNW Community Liaison staff, Community Leadership (TA's), and Lead social ecologist.
Project Steering committee	WILDTRUST	EKZNW, EDTEA, DFFE, Traditional Authorities Reps
KZN, Provincial Coordinating Committee	EDTEA	EKZNW, NGO's
Mintech Working Group 8	DFFE	Government departments
Estuary-related Community Workshops	WILDTRUST	Broad representation from Estuary communities.
Climate mitigation and adaptation knowledge-building workshops	WILDTRUST	EDTEA, DFFE, WILDTRUST, EKZNW and relevant local municipalities and key stakeholder groups reps
Women's group training and peer support groups	WILDTRUST	Female leaders in communities
Community involvement in the identification of criteria (including where the recruitment pool stems from within project feasibility) for employment opportunities	WILDTRUST	Traditional authorities, leadership reps and Councillors
Environmental Management Plan for Hub Construction	Consultant	WILDTRUST, EKZNW.
Facilitate Awareness-raising (Media articles and publications)	WILDTRUST	Regional media
Workshops, webinar series and publication of EbA MPA lessons learned	WILDTRUST	All stakeholders

4.4 Informed Consultation and Participation process

WILDTRUST is committed to Informed Consultation and Participation (ICP) of Project Affected Peoples (PAPs). This process will:

- a) Involve PAPs and Traditional Local Communities' representative bodies and organisations (e.g., councils of elders or village councils, or chieftains) and, where appropriate, other community members;
- b) Provide sufficient time for PAPs and Traditional Local Communities' decision-making processes;
- c) Allow for PAPs and Traditional Local Communities' effective participation in the design of project activities or mitigation measures that could potentially affect them either positively or negatively;
- d) Build knowledge and capacity of PAPs and Traditional Local Communities where needed to engage with confidence in consultations;

4.5 Record Keeping, monitoring & evaluation

4.5.1 Stakeholder Register

It is important that issues raised during the consultation process are recorded in a logical and systematic way. The Stakeholder Register database for this project will be set up in an Excel file. The register will record at least the following but may be extended to document additional information, if necessary:

- Stakeholder;
- Contact details (unless requesting anonymity);
- Date of contact(s);
- Issue(s) raised (comment, suggestion, question, complaint, etc.);
- Proposed response and actions to be taken; and
- Status (recorded, active, closed).

Where many stakeholders raise similar issues, these will be grouped as "issues" and responses to them and will be tracked together in a separate section of the register. An appropriate cross-reference will be made in the response column in the main register.

4.5.2 Stakeholder Register

Monitoring will be performed on a regular basis. Documents used for monitoring will be:

- Lists of participants of stakeholder meetings (sometimes combined with photographs)
- Meeting Minutes and notes
- Stakeholder register
- Grievance Log

- Staff notes from feedback received during everyday engagements

WILDTRUST will update the SEP through the lifetime of the project, in particular whenever there have been changes to the project, additional stakeholder activities or when particular milestones (e.g., agreements with communities) have been reached.

Monitoring and reporting of stakeholder engagement activities will help the Project track issues/ concerns, thereby providing an understanding of trends that will help pre-empt risk management activities. Furthermore, monitoring and evaluating the project's performance with regard to stakeholder engagement will allow for its efficacy to be evaluated and improved where necessary.

The stakeholder register and planned engagement will be updated regularly and at least on a quarterly basis. Through updating the register, the project will track some basic indicators which are commonly used to monitor and evaluate the effectiveness of a Project's stakeholder engagement programme, including:

- List of stakeholder events/ activities carried out during the reporting period and the stakeholders targeted (this will be combined with photographs at times)
- Number of participants at each event/ activity (disaggregated by gender)
- Percentage of ICP engagement activities undertaken during the review/ reporting period
- Percentage of follow-up actions addressed/ completed during the reporting period
- Proportion of year's planned stakeholder engagement completed during the reporting period

5. Grievance Mechanism

Please see attached in **Annex 1**.

6. Environmental and Social Code of Practice (ESCOP)

An ESCOP safeguard will be developed in the Inception Phase (first six months) of the project. Please refer to **Table 6** above for the application of the ESCOP.

7. Process Framework

This section details the purpose of the Process Framework, the identification of potential impacts, and the mitigation measures planned. This Process Framework is *preliminary* and will be further developed in the Inception Phase of the project.

7.1 Purpose of the Process Framework

The project has the potential to contribute to increased access restrictions within the Project Area, and potential risks and impacts are documented in the Process Framework. While the stakeholders and natural resource user groups who will be affected by the MPA's existing zonation and legislated access restrictions have been broadly identified, it is not yet clear to WILDTRUST or the MPA authorities (Ezemvelo KZN Wildlife (EKZNW) which households and individuals are likely to be affected, the number of households and individuals, and the type of impacts possible. This is particularly true in this project where there are pre-existing Nature Reserves, Estuary Management Plans (EMPs) and the recently designated MPA that will be supported, making for quite a complex zoning and regulatory context, which requires careful stakeholder engagement and assessment.

The **principal purpose of this Preliminary Process Framework** is to ensure that the project, and the MPA (where it is within the control/influence of the project), have a clear participatory process to enable the participation of affected communities and PAPs in the design of the project activities, identification of impacts, and development of any necessary mitigation measures. This process would apply the mitigation hierarchy, prioritising avoidance, then minimisation, and then compensation (livelihood restoration).

The project activities are aimed at mitigating any negative impacts of the existing legislated access restrictions and ensuring the voices of those impacted are heard and that they are empowered to engage in and benefit from the MPA management planning process and the implementation of management measures to improve the sustainability and status of natural systems and resources in and around the MPA.

The project recognises that through the proposed risk and impact assessment, it is possible that no access restrictions are identified that lead to moderate or substantial impacts, in which case the Process Framework will be discontinued (i.e. the safeguard will be considered unnecessary). The project has taken a precautionary approach to access restrictions, ensuring that we take time at the onset of the project to assess and review circumstances before implementing any activity that could cause harm. This Process Framework will allow for ongoing monitoring of new risks and impacts and also the progress and effectiveness of any measures identified to manage impacts.

7.2 Identifying, assessing and minimising impacts

The project has taken the following steps to identify, assess and minimise impacts of access restrictions:

- Conducting an E&S screening through the Blue Action Fund ESMS questionnaire, including expert review, production of a Blue Action Fund Screening Report, and subsequent E&S assessment

(June – September 2021) to collate existing data and information, characterise environmental and social context, and conduct a high-level assessment of risks.

- Stakeholder engagement during the concept note and full proposal design and development, and during the E&S assessment.
- The project's Preliminary Process Framework has identified the types of access restrictions but does not yet assess the types of impacts, which will occur during the project itself, these impacts still need to be confirmed by baseline data gathering and stakeholder engagement.

Next steps will include:

- Project-supported baseline data gathering in the sites where the project will be conducting management planning and livelihood development work and support to the MPA management authorities (EKZNW) to engage with stakeholders affected by the zones and restrictions in the broader MPA area outside of the two chosen project sites.
- The Interim Process Framework, to be developed during the project inception period, will include a confirmation of project impacts at the two project sites, including impacts per stakeholder group/community, and a description of the broader impacts based on planning with EKZNW and further stakeholder engagement.

Table 9 below summarises the access restrictions and presents an analysis of the affected groups, the potential restrictions and losses, and the potential impacts. This analysis will be built upon during the project inception phase and will form the basis for the entitlement matrix, which is yet to be developed for this project.

Table 9: Access restrictions, affected groups and potential impacts

No.	Affected Group	Area	Zone where restrictions apply	Cause/ contribute/ linked to	Potential restriction or loss	Description of the potential impact	Avoidance, minimisation Completed todate
A: Sites for Riparian Rehabilitation and Estuary Management Plan development and implementation							
							
A.1	Farming households with land and farmers in the estuarine and riparian zones and floodplains selected for rehabilitation. Any other households with land holdings in rehabilitation areas. Number of households unknown.	Estuarine restoration sites: Umlalazi Estuary (Nyembe Community) and Amatikulu-Nyoni (Nqutshini Community), uThukela and Zinkwazi estuaries	Areas selected for rehabilitation within the Estuary Management Plans.	Cause	Management Plan to include restriction of agricultural activities in riparian zones (as per existing NEMA legislated regulations), and improved law enforcement to implement this, to allow for regeneration of natural vegetation along the estuary/ riparian edges. Proposed change in land use from agriculture or degraded state to regeneration agriculture/ conservation.	Limited or no impact in the case that alternative livelihoods or improved agricultural practices are intended to replace the livelihoods and/or food security from agriculture within the functional estuarine area and/or the riparian zone. Potential negative impact if alternative options not available or are	Planning has not started. Estuary Management Plans to be developed in a participatory manner. Mitigation could include support for climate-smart agriculture practices, permaculture, restoration jobs.

						not as effective as planned.	
A.2	As per B1.1-B1.2 below: outside of the the focal restoration areas, Estuary Management Plans would include restriction of farming in estuarine functional areas and in riparian zones, and implementation will involve law enforcement as per B.1. This is considered under section B below as it is a project contribution and would still need to be considered for these two sites.						

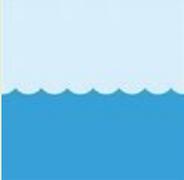
No.	Affected Group	Area	Zone where restrictions apply	Cause/ contribute/ linked to	Potential restriction or loss	Description of the potential impact	Avoidance, minimisation completed to date
B: uThukela MPA inshore and offshore areas							
B.1: Estuaries, inshore controlled zones and restricted zones							
<p>Note that in Restricted Zones, there is no extractive use permitted. In Controlled Zones, all activities permitted within the MPA Regulations are allowed <based on permitsystem>.</p> <p>For all of the Estuary areas, there is potential for additional access, land-use and resource use restrictions to be included in the nine Estuary Management Plans.</p>							
							

No.	Affected Group	Area	Zone where restrictions apply	Cause/ contribute/ linked to	Potential restriction or loss	Description of the potential impact	Avoidance, minimisation completed to date
B.1.1	Local illegal gill net fishers fishing for entrepreneurs/ livelihoods. Number of fishers unknown.	Estuaries; inshore controlled zones; restricted zones	Restricted Zones – AIRZ, SIRZ; Controlled Zones – MICZ, TICZ; Estuary Management Plans	Contribute	Gillnet fishing is illegal under MLRA (1998) but continues along the coast. Support to enforcement would prevent the activity.	Increased transaction costs to avoid enforcement –or reduced cash income for fishers and operators from the activity.	No avoidance pursued as illegal activity. Alternative livelihood options for these fishers in the form of line-fishing or nature guiding will be explored
B.1.2	Local seine net fishers fishing for entrepreneurs/ livelihoods. Number of fishers unknown.	As above	As above	Contribute	Seine net fishing is illegal under MLRA (1998) but continues along the coast. Support to enforcement would prevent the activity.	Increased transaction costs (to avoid enforcement or reduced cash income for fishers and operators from the activity.	No avoidance pursued as an illegal activity. Alternative livelihood options for these fishers in the form of line-fishing or nature guiding will be explored

No.	Affected Group	Area	Zone where restrictions apply	Cause/ contribute/ linked to	Potential restriction or loss	Description of the potential impact	Avoidance, minimisation completed to date
B1.3	Shore angling ³ . Number of fishers unknown.	As above	As above	Contribute	Shore angling is legal under the NEMPA regulations of the MPA in controlled zones, and outside the MPA under MLRA (1998) (but requires post office permit).	Limited impact as the restricted areas are very small in the MPA, and shore angling can continue in adjacent areas.	Limited size of RZs. Permit system.
B1.4	Shore-based spearfishing. Number of fishers unknown.	As above	As above	Contribute	Shore-based spearfishing is legal under the NEMPA regulations of the MPA in controlled zones, and outside the MPA is legal under MLRA (1998).	Limited impact as the restricted areas are very small in the MPA, and spearfishing can continue in adjacent areas	Limited size of RZs. Permit system
B1.5	Harvesting of invertebrates. Number of fishers unknown.	As above	As above	Contribute	Harvesting of invertebrates is legal under the NEMPA regulations of the MPA in controlled zones and outside the MPA under MLRA (1998).	Limited impact as restricted zones are small.	Limited size of RZs. Permit system. Potential to establish Co-management zone for subsistence harvesters in terms of NEMPA
B1.6	Wood harvesting. Number of wood harvesters unknown.	As above	As above	Contribute	Wood harvesting is illegal unless a permit has been issued by the PA Management Authority, as per NEMPA regulations.	Unknown	Permit system.

No.	Affected Group	Area	Zone where restrictions apply	Cause/ contribute/ linked to	Potential restriction or loss	Description of the potential impact	Avoidance, minimisation completed to date
B1.7	Mangrove wood harvesting. Number of mangrove wood harvesters unknown.	As above	As above	Contribute	Mangrove wood harvesting is illegal unless a permit has been issued by the PA Management Authority, as per NEMPA regulations.	Unknown	Permit system.
B1.8	Other forms of natural resource use. Other forms of natural resource use still to be understood.	As above	As above	Contribute	e.g. Ncema grass or Weed used for basket weaving and mats are illegal unless a permit has been issued by the PA Management Authority, as per NEMPA regulations	Limited impact as EKZMW already implements an annual seasonal harvesting system for this practice at both sites	Permit system.
B1.9	As per A.1: riparian rehabilitation could restrict agricultural activities in riparian zones to allow for regeneration along the estuary/ riparian edges. Proposed change in land use from agriculture to regeneration/ conservation in the remaining seven estuaries						

³ Note that shore angling includes roving fishers who are mostly line-fishers. Some roving fishers will travel in as ski-boat club members etc, for recreational purposes.

No.	Affected Group	Area	Zone where restrictions apply	Cause/ contribute/ linked to	Potential restriction or loss	Description of the potential impact	Avoidance, minimisation completed to date
C: MPA offshore areas							
							
C.1	Commercial offshore fishers: <u>shallow water prawn fishers (trawl)</u> . 2 boats intermittently using the area.	uThukela MPA – offshore	TORZ off limits. Trawl grounds available outside of the MPA.	Contribute	Whole MPA (all zones) is off-limits; the designation of MPA has already removed the opportunity for continuing with the shallow water prawnfishery in this area. Trawl grounds available outside of the MPA.	2 boats known of that generated income from this activity No impact from the project except law enforcement will ensure implementation of the regulations	None.
C.2	Commercial offshore <u>ski- boat f operators for non- extractive activities e.g. whale watching / shark cage diving etc.s.</u> Number affected unknown.	uThukela MPA - offshore	All offshore boat-based non-extractive activities involving threatened species is prohibited without a permit from DFFE, and these permits have specific rules.	Contribute	Annual permits are required TORZ off limits without a permit. All zones off limits for activities involving threatened species without a permit.	Likely positive for these ski boat operations as the effective management of the MPA will improve the status of these iconic species.	None.

No.	Affected Group	Area	Zone where restrictions apply	Cause/ contribute/ linked to	Potential restriction or loss	Description of the potential impact	Avoidance, minimisation completed to date
C.3	Commercial offshore fishers: <u>commercial line fishers</u> . Number affected unknown.	uThukela MPA - offshore	All offshore zones off limits all off limits (TORZ; TOCZN; TOCZS; TOCPLZ) apart from TOCCZ. No new entrants now that the MPA has been declared. Every 5 years, rights allocation process at national level for commercial fishers is opened.	Contribute	All zones off limits apart from the TOCCZ. Commercial line fishing can occur in the CCZ subject to relevant permit The ski-boat fisher's 7-year licence runs out soon	Limited impact as CCZ still available for commercial fishing.	Inclusion of the CCZ to avoid allout prohibition.
C.4	Recreational offshore fishers (<u>line, spear</u>)	uThukela MPA - offshore	TORZ off limits; regulated (permit-based) access to other zones	Contribute	TORZ off limits; permits required in other areas. Night fishing prohibited.	Limited impact as all other zones are available for recreational fishing.	Permit system to allow recreational fishing to continue in other zones.

No.	Affected Group	Area	Zone where restrictions apply	Cause/ contribute/ linked to	Potential restriction or loss	Description of the potential impact	Avoidance, minimisation completed to date
D: Existing Nature Reserves							
D.1	Local natural resource users adjacent to ANR	Adjacent Protected Areas 	Amatikulu Nature Reserve (ANR).	Contribute [will support to Ezemvelo KZN potentially reinforce ANR].	Swamp forests for wood, growing in flood plains, wild game harvesting, multi-harvesting (some allow permitting) waterways – fish, reeds, grass – existing. People not stopped going to cultural sites. High levels of conflict between local communities and Ezemvelo KZN Wildlife over access to natural resources.	Extractive use from areas inside the ANR is illegal unless a permit has been issued by the PA Management Authority	A seasonal system to provide access for reed harvesting for adjacent communities is already in place.
D.2	Local natural resource users adjacent to UNR.	Adjacent Protected Areas 	Umlalazi Nature Reserve (UNR)	Contribute [will support to Ezemvelo KZN potentially reinforce UNR].	As per ANR above. High levels of conflict between local communities and Ezemvelo KZN Wildlife over access to natural resources.	Extractive use from areas inside the UNR is illegal unless a permit has been issued by the PA Management Authority	A seasonal system to provide access for reed harvesting for adjacent communities is already in place.

7.3 Mitigation measures

The project has taken steps in project design to mitigate any potential impacts of access restrictions through the development of activities aimed at targeting livelihoods support and through the projects baseline, targeting these activities at those most affected. A summary of these livelihoods activities are detailed below.

Summary of the livelihood programmes as per the activities in the Full Proposal

1.1.6 Rural Community Workshops.

Organise and facilitate workshops aimed at improving understanding of MPA benefits; the zonation and restrictions affecting the rural communities living adjacent to uThukela MPA and empowering community members to engage constructively with authorities around grievances and to hold their own in meetings with other more capacitated stakeholders.

1.4.6 Implement identified sustainable financing mechanisms.

Identify and initiate implementation of two (2) potential sustainable financing mechanisms in Years 4 and 5 and convene a workshop with national and local managers, stakeholders and investors in Year 5 to assess success and discuss lessons learned.

2.1.4 Training and information dissemination.

Implement training workshops on climate-smart sustainable harvesting and farming practices at the Community Centres in the two target areas for vulnerable communities to improve co-operation and understanding of ecosystem rehabilitation efforts.

3.1.3 Community involvement in beach and dune vegetation restoration.

Community youth job and training job opportunities will be created through the WILDTRUST Youth Employment Services (YES) partnership with Nedbank.

3.2.3 Community involvement in estuarine restoration

Community youth job and training job opportunities will be created through the WILDTRUST /Nedbank-YES and NRM partnerships.

3.3.3 Community involvement in riparian zone restoration.

Community youth job and training job opportunities will be created through the WILDTRUST /Nedbank-YES and NRM partnerships.

4.3.3 Introduction of sustainable income generating opportunities for fishers.

Subsistence fishers will be offered training as tourist guides for mangrove forests and enable small community tourism enterprises (such as kayaking and nature trails) and engage with community leadership to achieve a switch from unsustainable netting in estuaries near mangroves to line-fishing. Community youth job and training job opportunities will be created through the WILDTRUST / Nedbank-YES and NRM partnerships

5.1.1 Baseline livelihoods and Perceptions Survey and reassessment.

These surveys will be undertaken by UKZN under the direction of Dr Cathy Sutherland and will be undertaken in Year 1 and 4 of the projects. Two (2) baseline surveys will focus most intensively on the vulnerable communities at the two (2) project sites where Community Centre's will be established, and sustainable livelihoods initiatives developed, as well as the other 6 EMP areas.

5.1.2 Identification of potential livelihood initiatives.

Interviews, focal group discussions and workshops held with rural communities adjacent to the MPA, tourism operators, business owners and conservation and environmental managers to identify opportunities, challenges, and endogenous skills and strengths for development and support for of sustainable livelihoods initiatives.

5.1.3 Community eco-cultural tour guide livelihood initiative.

Train (including water and guiding skills) and provide community members with kayaks to take day-visitors on guided kayaking on the estuaries of the Siyaya Coastal Park, coupled with board walking trails through coastal forests and on beaches. Provide a booking platform for day excursions through tourism offices and Ezemvelo KZN Wildlife visitor reception offices. Develop online marketing material to advertise this initiative.

5.1.4 Community-run campsites. Train community members in hospitality and provide them with start-up resources to establish community-run campsites associated with each of Community Centre's situated near to both estuary and beaches.

5.1 5 Support for communities not at focal sites.

Vulnerable people identified who are directly affected by the MPA and do not form part of the communities supported via the 2 Community Climate Adaptation Resource Centres (i.e. the sites connected to the 4 other estuaries where we will be developing estuary plans and the upper catchment restoration sites) will be provided with livelihood support through: Restoration jobs (at communities near the restoration sites), network & bridge building to opportunities facilitated through various communication channels and forums established in the projects inception phase, and learning exchanges with two priority sites .

5.2.2 Leadership training.

Provision of leadership training and mentorship/coaching for women who have either studied a relevant diploma/degree and are looking to enter the job market, or women already in existing employment in sustainable resource use / MPA management.

5.2.3 Enterprise development training provided through Community Climate Adaptation Resource Centre's.

Includes support with developing a business (enterprise) idea, through to implementation, marketing, sales, and financial management.

5.2.4 Micro-enterprise establishment.

Mentorship and micro-enterprise incubation of selected female entrepreneurs (or groups in co-operatives) who graduate from training with promise. This will include start-up grants, with an emphasis on supporting sustainable businesses that contribute to community climate resilience solutions and a healthier marine and estuarine environment.

5.2.5 Peer support groups.

Facilitate set up support groups/networks, that meets monthly at the two (2) Community Climate Adaptation Resource Centre's.

5.3.1 Climate adaptation youth job creation through YES internships in the project's climate ecosystem services restoration work, awareness-raising activities at schools, monitoring and survey activities and training and awareness activation as at the community hubs. Traditional Authority leadership and community councilors will be included in selection criteria generated for employment opportunities.

5.3.2 Career development support.

Provide work experiences and implement training and skills development and career guidance to improve employability, with ongoing support with CV preparation, applications, and interview techniques.

5.4.1 Community Climate Adaptation Resource Centre in the adjacent rural community, close to the Siyaya Coastal Park to support robust community engagement around the project's objectives and deliverables, provide access to information about MPA's and the marine environment (and specifically the uThukela MPA), training (enterprise development, climate-smart livelihood techniques), environment and climate awareness, career guidance, and IT access.

5.4.2 Training, awareness and education provided at hubs about the impacts of climate change, and sustainable resource use, and specifically the likely effects on the coastal communities living alongside the uThukela MPA. Awareness raised about climate-smart energy, agriculture and sustainable resource use harvesting resulting in cost saving in the short and medium-term, and increased climate resilience in the long term. School marine ocean literacy and climate adaptation learning programmes and activities, using the YES programme to deploy trained youth into schools and to run awareness-building activities at the two (2) Community Climate Adaptation Resource Centre

5.4.3 Demonstration of climate-smart homestead-based solutions including permaculture gardening, alternative energy, water harvesting, and sustainable resources use. Food and water security enhanced through climate-smart demo gardens and training at the hubs, and YES youth acting as extension workers to mentor community members in maintaining healthy gardens that provide homestead vegetable food security in long-term.

5.4.4 Promote sustainable resource use practices and reservation of important natural cultural sites. Support to the wetland reed (ncema) harvesting system that provides for communities to collect materials for traditional basket weaving and mats from the protected areas, and facilitation of identification and access to cultural sites (like ancestor burial grounds and ancient cattle kraals) for communities.

8. Disclosure process

Disclosure of ESMS documentation will include the following:

- 1) Disclosure of ESMP and associated safeguards (in English only) on the Blue Action Fund
Website: <https://www.blueactionfund.org/>
- 2) Translation of this Safeguard Disclosure Document, along with Annex 1 – the Grievance Mechanism, into isiZulu.
- 3) Communication of this Safeguard Disclosure sheet via:
 - a. Up-loading both the English and Zulu versions of this document onto the WILDTRUST website for one full month: <https://wildtrust.co.za/governance/>.
 - b. Email to all stakeholders who we have email addresses for and to follow up with any additional stakeholders brought to our attention during the disclosure period.
 - c. Contact made with both of the community leaders (“AmaKhosi”) connected to / affected by this project, with a request for how they would like the materials delivered and/or

displayed to ensure broad community access, with an emphasis on reaching vulnerable groups identified in the E&S Development Tool.

- d. Two community meetings (one in the North and one in the South), advertised on local radio, with two weeks' notice.

9. Conclusion

In summary this project aims to stimulate the revival of the coastal systems in and around the uThukela MPA, located in an important “eco-complex” of an integrated assemblage of connected ecosystems that are highly relevant for climate adaptation. By introducing effective management for this MPA and associated estuaries and initiating nature-based solutions to deal with the challenges faced by this complex socio-ecological system, this project could play a significant role in restoring this important area to a productive and regenerative state, in which people and nature can endure and thrive into the future.

The WILDTRUST remains dedicated to implementing this project in the most ethical, just and fair way possible, mitigating potential harm to people or nature while promoting benefits for both. If there are any areas where stakeholders feel we are not meeting our commitments or have suggestions for improvement, these concerns or contributions are welcomed and can be sent to the ESMS Manager at ESMS@wildtrust.co.za.