



# **Building socio-ecological resilience to climate change impacts by ecosystem-based adaptation approaches at iSimangaliso MPA**

## **Environmental and Social Management Plan (ESMP)**

Wildlands Conservation Trust [WILDTRUST]

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## List of Acronyms and Abbreviations

<i>ABCD</i>	<i>Asset Based Community Development</i>
<i>ABS</i>	<i>Access to Genetic Resources and the Fair and Equitable Sharing of Benefits Arising from their Utilization</i>
<i>BABS</i>	<i>Bioprospecting, Access and Benefit Sharing</i>
<i>Blue Action</i>	<i>Blue Action Fund</i>
<i>BMZ</i>	<i>German Federal Ministry for Economic Cooperation and Development</i>
<i>BRUV</i>	<i>Baited Remote Underwater Video</i>
<i>CARA</i>	<i>Conservation of Agricultural Resources Act</i>
<i>CBD</i>	<i>Convention on Biological Diversity</i>
<i>CITES</i>	<i>Convention on International Trade in endangered Species of Wild Fauna and Flora</i>
<i>COGTA</i>	<i>Co-operative Governance and Traditional Affairs</i>
<i>DARD</i>	<i>Department of Agriculture and Rural Development</i>
<i>DEA</i>	<i>Department of Environmental Affairs</i>
<i>DFFE</i>	<i>National Department of Forestry, Fisheries and Environment</i>
<i>DRDLR</i>	<i>Department of Rural Development and Land Reform</i>
<i>EAF</i>	<i>Ecosystem Approach to Fisheries</i>
<i>EBA</i>	<i>Ecosystem Based Adaptation</i>
<i>EDTEA</i>	<i>Department of Economic Development, Tourism, and Environmental Affairs</i>
<i>E&amp;S</i>	<i>Environmental and Social</i>
<i>EEZ</i>	<i>Exclusive Economic Zone</i>
<i>EFZ</i>	<i>Exclusive Fishery Zone</i>
<i>EFZ</i>	<i>Estuarine Functional Zones</i>
<i>EHSGs</i>	<i>Environmental Health and Safety Guidelines</i>
<i>EIA</i>	<i>Environmental Impact Assessment</i>
<i>EKZNW</i>	<i>Ezemvelo KwaZulu-Natal Wildlife</i>
<i>EMP</i>	<i>Estuary Management Plan</i>
<i>ERP</i>	<i>Emergency Response Plan</i>
<i>ESA</i>	<i>Environmental and Social Assessment</i>
<i>ES COP</i>	<i>Environmental and Social Code of Conduct</i>
<i>ESIA</i>	<i>Environmental and Social Impact Assessment</i>
<i>ESMP</i>	<i>Environmental and Social Management Plan</i>
<i>ESMS</i>	<i>Environmental and Social Management System</i>
<i>FAO</i>	<i>Food and Agriculture Organization</i>
<i>FPIC</i>	<i>Free, Prior and Informed Consent</i>
<i>GAP</i>	<i>Gender Action Plan</i>
<i>GBV</i>	<i>Gender Based Violence</i>



GCF	<i>Green Climate Fund</i>
GDPR	<i>General Data Protection Regulation</i>
HO	<i>Honorary Officer</i>
H&S	<i>Green Climate Fund</i>
ICM	<i>Integrated Coastal Management</i>
ICP	<i>Informed Consultation and Participation</i>
ICZMA	<i>Integrated Coastal Zone Management Act</i>
IDP	<i>Integrated Development Plan</i>
IGRF	<i>Intergovernmental Relations Framework Act</i>
IPs	<i>Indigenous Peoples</i>
IPACC	<i>Indigenous Peoples of Africa Coordinating Committee</i>
IUCN	<i>International Union for the Conservation of Nature</i>
IUU	<i>Illegal, Unreported and Unregulated</i>
ILO	<i>International Labour Organisation</i>
IMO	<i>International Maritime Organisation</i>
IMP	<i>Integrated Management Plan</i>
IWP	<i>iSimangaliso Wetland Park</i>
IWPA	<i>iSimangaliso Wetland Park Authority</i>
LE	<i>Law Enforcement</i>
LM	<i>Local Municipality</i>
LOSC	<i>Law of the Sea Convention</i>
LUMS	<i>Land Use Management Scheme</i>
KZNNCA	<i>KwaZulu-Natal Nature Conservation Act</i>
MARPOL	<i>International Convention for the Prevention of Pollution from Ships</i>
MLRA	<i>Marine Living Resources Act</i>
MP	<i>Management Plan</i>
MPAs	<i>Marine Protected Areas</i>
M&E	<i>Monitoring and Evaluation</i>
NEMA	<i>National Environmental Management Act</i>
NEM: BA	<i>National Environmental Management Biodiversity Act</i>
NEM: ICMA	<i>National Environmental Management: Integrated Coastal Management Act</i>
NEMP	<i>National Estuarine Management Protocol</i>
NEM:PAA	<i>National Environmental Management Protected Areas Act</i>
NGO	<i>Non-Governmental Organisation</i>
NHRA	<i>National Heritage Resources Act</i>
NMU	<i>Nelson Mandela University</i>
NR	<i>Natural Resource</i>
OHS	<i>Occupational Health and Safety</i>
ORRAA	<i>Ocean Risk and Resilience Action Alliance</i>
ORI	<i>Oceanographic Research Institute</i>



<i>OU</i>	<i>Oceans Unite</i>
<i>PAJA</i>	<i>Promotion of Administrative Justice Act</i>
<i>PAPs</i>	<i>Project Affected People</i>
<i>PF</i>	<i>Process Framework</i>
<i>PPP</i>	<i>Public Participation Processes</i>
<i>PSSA</i>	<i>Particularly Sensitive Sea Areas</i>
<i>ROV</i>	<i>Remotely Operated Vehicle</i>
<i>SAAMBR</i>	<i>South African Association for Marine Biological Research</i>
<i>SAEON</i>	<i>South African Environment Observation Network</i>
<i>SAIAB</i>	<i>South African Institute of Aquatic Biodiversity</i>
<i>SAHRA</i>	<i>South African Heritage Research Agency</i>
<i>SAPS</i>	<i>South African Police Service</i>
<i>SEP</i>	<i>Stakeholder Engagement Plan</i>
<i>SEWG</i>	<i>Stakeholder Engagement Working Group</i>
<i>SOPs</i>	<i>Standard Operating Procedures</i>
<i>SPLUMA</i>	<i>Spatial Planning and Land Use Management Act</i>
<i>S&amp;T</i>	<i>Stakeholder Engagement Working Group</i>
<i>SSF</i>	<i>Small-scale fishers</i>
<i>ToR</i>	<i>Terms of Reference</i>
<i>UKZN</i>	<i>University of KwaZulu-Natal</i>
<i>UNDRIP</i>	<i>United Nations Declaration on the Rights of Indigenous Peoples</i>
<i>WB ESF</i>	<i>World Bank Environmental and Social Framework</i>
<i>WB ESS</i>	<i>World Bank Environmental and Social Standard</i>
<i>WIO</i>	<i>Western Indian Ocean</i>
<i>YES</i>	<i>Youth Employment Service</i>



# 1 Introduction

This document is the Environmental and Social Management Plan (ESMP) for the iSimangaliso Wetland Park (IWP) MPA EbA Project (hereafter referred to as “the Project”) and outlines the environmental and social management commitments that WILDTRUST will implement to manage potential negative impacts and enhance potential positive impacts of the project. The ESMP will also introduce the other Safeguard Instruments to be applied in this project (e.g., the stakeholder engagement plan, grievance mechanism, etc.), which are included as Annexes to this document. As such, this introductory section as well as the project description (Section 2) and legal framework (Section 3) serve as a background for all of the Safeguard Instruments<sup>1</sup>.

At the project proposal stage, the ESMP and other Safeguard Instruments will be provisional in nature and will take on the form of a Framework. However, the management measures identified in the frameworks will have been integrated into the project design and resourced appropriately. The ESMP will then be updated and finalised within the project inception phase (the first six months of project implementation), as illustrated in **Table 1** below. The ESMP acts as the umbrella Safeguard Instrument and is referred to throughout the Blue Action Fund safeguarding principles and requirements (see Blue Action Fund ESMS Requirements, 2021). Importantly, the Monitoring and Evaluation (M&E) Section of this ESMP (Section 5), will be used on an annual basis to report on relevant monitoring across all of the Safeguard Instruments.

**Table 1:** Blue Action Fund requirements for environmental and social assessment and risk management, including the development of the Environmental and Social Management Plan (ESMP) through the project design and implementation process (Blue Action Fund E&S Safeguarding Principles and Requirements, ESMS Manual Annex B).

Blue Action Fund requirements	Project design		Project implementation		
	Concept note stage	Proposal stage	Inception Phase	Annually (or end of Year 1)	Project closing phase
E&S screening [Criterion 1.1]	Required.				
E&S assessment [Criterion 1.2]		Required.			
Risk management measures and plans (ESMP) [Criterion 1.3]	Na.	Framework level <sup>2</sup> ESMP	Plan level ESMP	Na.	Na.
E&S Capacity [Criterion 1.4]					
Monitoring and reporting [Criterion 1.5]					

## 1.1 Purpose of the ESMP

This ESMP has been developed to outline the project’s overall environmental and social risk management strategy. It is intended as a ‘living document’ that will be regularly reviewed and updated by WILDTRUST in response to changes to the project description, changes in the WILDTRUST’s 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 documents and demonstrate WILDTRUST’s commitment to being transparent, accountable and accepting

<sup>1</sup> Excluding the Process Framework, which acts as a standalone document that can be read in isolation to the ESMP or other Safeguard Instruments.

<sup>2</sup> “Framework-level” includes the broad structure and approach, and to some degree remains conceptual. “Plan-level” has had substantial input from Project Affected Peoples (PAP) and other stakeholders and is what will actually be implemented in practice. These plans are often integrated into existing management plans, such as community or district development plans, fisheries management of MPA management plans.



responsibility for the potential project impacts (both positive and negative). No personal information/data<sup>3</sup> will be included in these publicly disclosed documents, and any personal data collected for the purpose of the Project, this ESMP and appended Safeguard Instruments, and maintained by WILDTRUST will be done so in a secure manner in line with Blue Action Fund's GDPR Policy.

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)<sup>4</sup>, the World Bank Group Environmental Health and Safety Guidelines (EHSGs), and all of those Standards and Guidelines referred to in Annex A of the Blue Action Fund ESMS Manual .
- Ensure that the potential negative environmental and social impacts of the Project are managed appropriately, for example:
  - Favouring avoidance and prevention over minimisation, mitigation or compensation when dealing with negative impacts; and
  - Where avoidance is not possible, reducing, restoring, compensating/ mitigating the negative impact.
- 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.

The ESMP serves as an umbrella Safeguard Instrument covering all of the identified environmental and social risks and impacts and allowing for the management and monitoring of these and any new risks adaptively. The ESMP therefore integrates the findings of:

- All environmental and social screening and assessment carried out during the design phase of the project; and
- The Safeguard Instruments (and specific mitigation measures) and other provisions identified for complying with the requirements of national legislation, the Blue Action Fund requirements and associated Standards, national legislation, as well as country and site-specific information relevant for the project's risk management strategy. The Safeguard Instruments appended to this ESMP can include the frameworks, plans and protocols to be used in the Project, and include:
  - Stakeholder Engagement Plan (Annexure A);
  - Grievance Mechanism (Annexure B);
  - Process Framework for Access Restrictions (Annexure C);
  - Gender Action Plan (Annexure D);

## 2 Project Description and Social Context<sup>5</sup>

This section defines the 'the Project', including the project area, key project components, activities, and partners/ responsibilities.

### 2.1 Brief project description

This section will be divided into two sub-sections, providing a brief description of the Project, including:

<sup>3</sup> Personal data includes any identifier like: name of individuals, identification numbers, location data (e.g. home address or mobile phone GPS data), or online identifiers such as IP or email addresses.

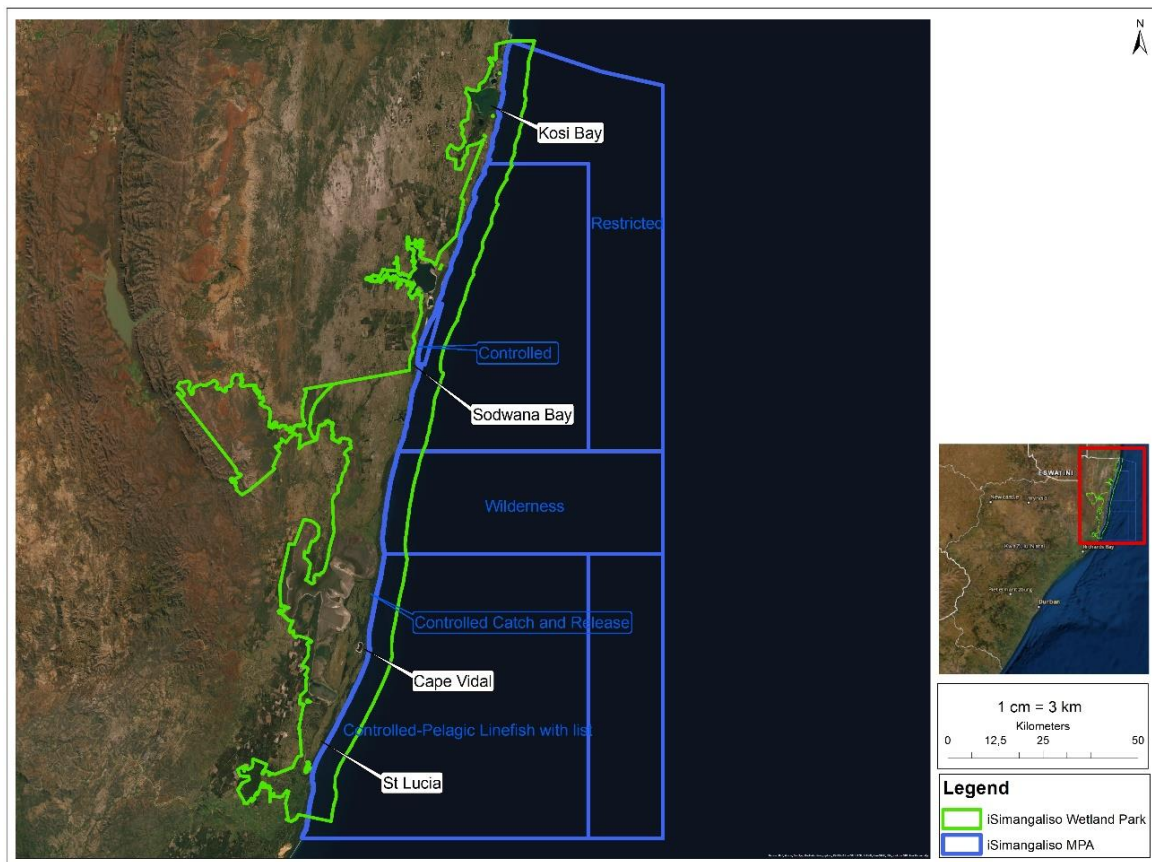
<sup>4</sup> Note that references to 'borrower' in the World Bank Environmental and Social Framework refer in this case to the lead NGO.

<sup>5</sup> This section can be based on the project description and social context sections which are commonly included in an Environmental and Social Assessment Report.

- Location of the Project and overall project area, including maps; and
- A description of the overall project objectives, the proposed project outcome(s) as well as the principal project components (e.g., law enforcement, habitat management, enterprise support etc.), and sub-components to achieve the objective and outcomes.

### 2.1.1 Project location

The Project is located in iSimangaliso Wetland Park in the Maputaland-Albany-Pondoland Global Biodiversity Hotspot on the east coast of South Africa in the KwaZulu-Natal Province (**Figure 1**). The Park comprises diverse landscapes, including beaches, coastal dune and swamp forest, lakes, and wetlands which serve as important nursery and nesting sites, and important habitats for sea turtles, for many species of plants and animals.



**Figure 1:** The iSimangaliso Wetland Park and new iSimangaliso Marine Protected Area situated in northern KwaZulu-Natal, South Africa.

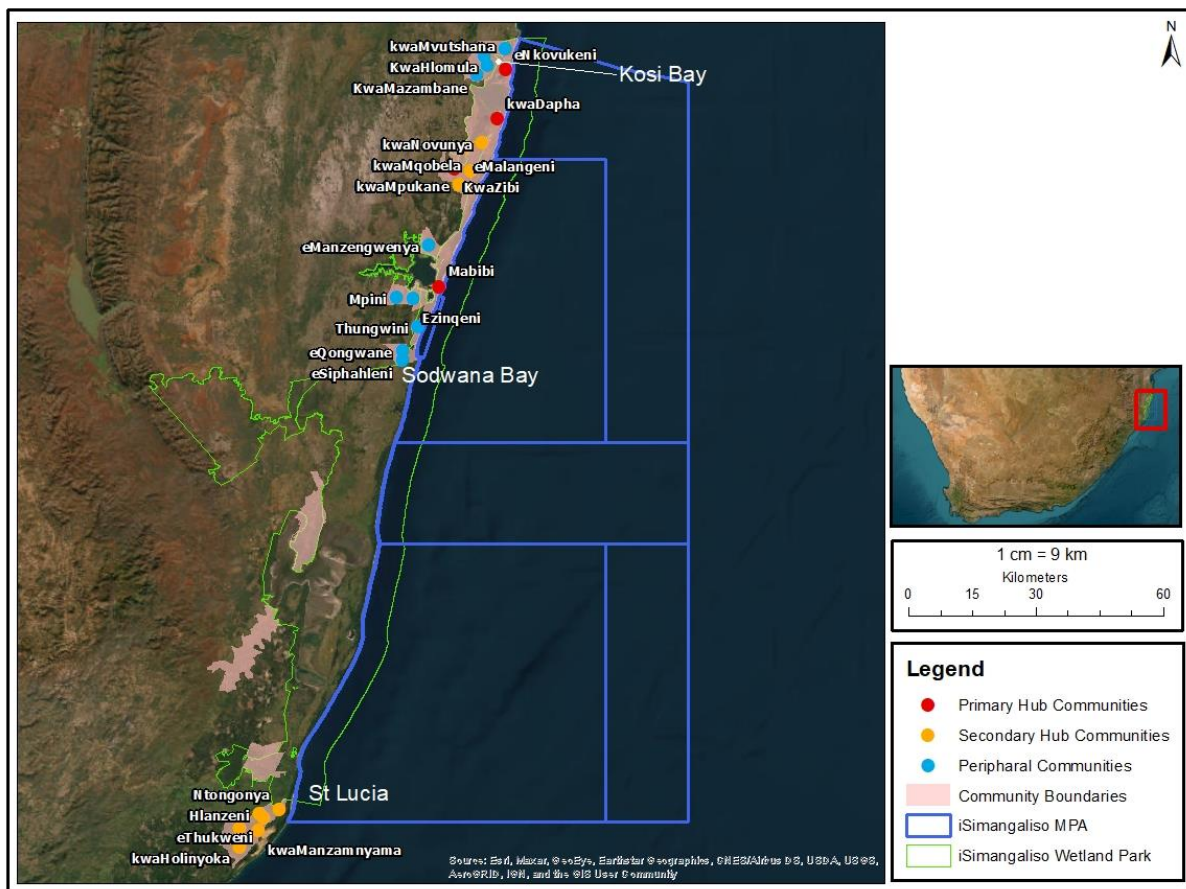
iSimangaliso MPA is 10,700 km<sup>2</sup> in extent (1,070,000 ha) and is South Africa's largest MPA. It was proclaimed in 2019 and is a combination of the former (now de-proclaimed) St Lucia and Maputaland MPAs combined with an expanded offshore area. It contains the coastal and marine ecosystems forming part of the iSimangaliso Wetland Park, a 240,000 hectare UNESCO World Heritage Site within which lie four Ramsar sites (St Lucia Lake System, Turtle beaches/Coral Reefs of Tongaland, Kosi Bay Lake System, and Lake Sibaya). The MPA does not include the St Lucia, Mgobozeleni and Kosi estuaries, although they fall within the iSimangaliso Wetland Park World Heritage Site. The coastal edge of the MPA follows the high-water mark of the sea.

The iSimangaliso Wetland Park World Heritage Site includes the entire shoreline of the iSimangaliso Wetland Park, therefore overlapping along the coast (and in the immediate near-shore zone) with the MPA. The Maputaland coastal plain is an acknowledged centre of biodiversity, and the Maputaland Centre of Endemism is part of the Maputaland-Pondoland-Albany biodiversity hotspot (IWPA, 2008).



The project area covers the extent of the MPA and extends inland (**Figure 2**) up to 10km with activities focused on the restoration and rehabilitation of mangroves, beach and dune vegetation, and livelihoods and community stakeholder engagement support.

The area surrounding the park is primarily rural, with small, dispersed settlements and limited economic activity. The region is characterized by high poverty and unemployment levels, with the majority of the local population relying on subsistence farming and fishing, and small social grants for their livelihoods, as well as some contributions from migrant family members working in cities. The park serves as an important source of tourism for the region, generating economic activity and providing work in eco-tourism activities, park management and supporting industries. Small towns and tourism settlements situated adjacent to the park include Manguzi, Mbazwana, Sodwana Bay, Cape Vidal and St Lucia. The nearby cities of Richards Bay and Durban are located approximately 100 km and 250km from the park, respectively. The land use around the park is primarily for agriculture, including sugarcane and cattle farming, as well as significant forestry plantations and some privately-owned conservation areas. The area is also an important cultural and historical site, with many communities that have lived there for generations (both inside and outside the park).



**Figure 2:** Map showing the location of the Project

**Table 2:** Marine Protected Areas (MPAs) included in the project

MPAs/ other management area	Country	Improved management/new/ expansion?	Core area km <sup>2</sup>	Buffer zone km <sup>2</sup>
iSimangaliso Marine Protected Area	South Africa	Improved Management	11 635 km <sup>2</sup>	
Estuarine Functional Zones of iSimangaliso MPA	South Africa	Improved Management	352 km <sup>2</sup>	
<b>Total</b>			<b>11 987 km<sup>2</sup></b>	

## 2.1.2 Project objective, proposed outcomes and key components

The overall objective for the Project is to build socio-ecological resilience to climate change for the iSimangaliso MPA, and its connected estuarine systems, and the dependent communities that live in and around the iSimangaliso Wetland Park World Heritage Site. In order to achieve this objective, the proposed outcomes will focus on four principal components, namely strengthened management, rehabilitation, improved livelihoods, EbA capacity building and knowledge sharing. It is envisaged that the proposed project outcomes will include:

1. **Strengthened management and protection of ecosystems** important for climate adaptation and mitigation in the iSimangaliso MPA and three associated estuarine systems of the iSimangaliso Wetland Park, including offshore coral reefs and kelp beds, estuarine mangroves, reed beds and swamp-forest in estuarine-associated floodplain areas, and forested coastal dune cordons.
2. **Rehabilitation and improvement of the ecosystem health** of coastal ecosystems relevant for climate change adaptation and mitigation, including mangroves, reed beds and swamp-forest in estuarine-associated floodplain areas and forested coastal dune cordons.
3. **Improved livelihoods and food security for vulnerable communities** associated with the iSimangaliso MPA and connected estuarine systems through community involvement in sustainable resource management (co-management) and identification and implementation of alternative livelihood opportunities.
4. **Improved knowledge and capacity for ecosystem-based adaptation approaches** for enhancing socio-ecological resilience in and around a financially sustainable MPA, providing a regionally relevant case study that informs policy and action elsewhere.

The Project includes the following activities:

**Table 3:** Summary of Primary Project Objectives and Key Activities

Primary Objectives		Key Activities	
1	<b>IMPROVED RESOURCES, INSTRUMENTS AND CAPACITIES FOR MPA MANAGEMENT AND SUSTAINABLE USE</b>	<b>Indicator 1.1</b> Improved Stakeholder Engagement	
		1.1.1	Create and support implementation of platform for dialogue and trust between IWP and rural community stakeholders
		1.1.2	Improve MPA & Estuarine stakeholder engagement (SE)
		1.1.3	MPA Stakeholder Forum meetings
		1.1.4	Rural Community Knowledge Building Workshops
		<b>Indicator 1.2</b> MPA Management Effectiveness	
		1.2.1	Management Effectiveness assessment processes for adaptive management
		1.2.2	Marine and estuarine enforcement and monitoring support
		<b>Indicator 1.3</b> MPA Management Staff Capacity-building	
		1.3.1	Refresher legal compliance training
		1.3.2	Refresher species identification training



		1.3.3	EbA focussed MPA and Estuarine Managers Course
		1.3.4	Essential skills training
		1.3.5	Vessel safety and confidence
		1.3.6	Train and employ local skippers from the communities and provide mentorship for sustainability
		<b>Indicator 1.4</b> Park Boundary Demarcation	
		1.4.1	Park Boundary Clarification for MPA communities
		1.4.2	Boundary demarcation area maps and information dissemination
		<b>Indicator 1.5</b> Community Co-management and Monitoring	
		1.5.1	Co-management for small-scale fishing
		1.5.2	Implement community small-scale fishery monitoring programmes
		1.5.3	Community Turtle monitoring programme
		<b>Indicator 1.6</b> Sustainable MPA Financing	
		1.6.1	Establish a team to implement and guide Sustainable Financing strategies development
		1.6.2	Carbon asset identification
		<b>Indicator 1.7</b> Improved Ocean literacy and sustainable fisheries knowledge	
		1.7.1	MPA Benefits Awareness Campaign
		1.7.2	Community Ocean Literacy and sustainable fisheries knowledge-building
		<b>Indicator 1.8</b> Improved Ocean literacy and sustainable fisheries knowledge	
		1.8.1	Environmental & Social Management System (ESMS) developed, implemented, and monitored
		1.8.2	ESMS Legal Review and Gap Analysis developed and communicated
<b>2</b>	<b>STRENGTHENED ADAPTIVE CAPACITY AND REDUCED EXPOSURE TO CLIMATE RISKS</b>	<b>Indicator 2.1</b> Climate-change Risk Assessment	
		2.1.1	Climate Vulnerability Assessment
		2.1.2	Socio-economic and project baseline surveys and assessments (climate-risk inclusions)
		2.1.3	Ecosystem baseline survey and assessment
		<b>Indicator 2.2</b> Climate-change Risk Monitoring, Reporting and Knowledge-building	



		2.2.1	Climate Mitigation and Adaptation Knowledge Building Workshops		
		2.2.2	Installation of Climate Monitoring Equipment		
		2.2.3	Ocean Stewards		
		2.2.4	Community-based drought, flood and storm tracking and information system		
3	<b>DEGRADED COASTAL ECOSYSTEMS, WHICH ARE PARTICULARLY RELEVANT FOR CLIMATE CHANGE ADAPTATION, REHABILITATED AND/OR PROTECTED</b>	<b>Indicator 3.1</b> Mangrove forests rehabilitated and protected.			
		3.1.1	Surveys of mangrove vegetation		
		3.1.2	Community involvement in mangrove protection		
		<b>Indicator 3.2</b> Riparian vegetation restoration and protection			
		3.2.1	Surveys of riparian vegetation		
		3.2.2	Restoration of riparian zone to a natural state		
		3.2.3	Community involvement in riparian zone restoration		
		<b>Indicator 3.3</b> Dune vegetation protection and rehabilitation			
		3.3.1	Surveys of coastal dune cordon vegetation		
		3.3.2	Rehabilitate the beach and dune vegetation to a natural state		
		3.3.3	Community involvement in beach and dune vegetation restoration		
		4	<b>SEQUESTERED CARBON OR REDUCED EMISSIONS</b>	<b>Indicator 4.1</b> Coral reef and kelp-bed protection	
				4.1.1	Coral Reef Ecosystem surveys and bleaching monitoring
4.1.2	Community involvement in coral reef protection				
<b>Indicator 4.2</b> Coral Reef Fish Protection					
4.2.1	Coral Reef Fish Surveys				
4.2.2	Fisher and dive operator awareness workshops				
<b>Indicator 4.3</b> Carbon sequestered in functional ecosystems maintained					
4.3.1	Estimation of carbon sequestered in climate relevant ecosystems				



<b>5</b>	<b>CLIMATE RESILIENT AND SUSTAINABLE LIVELIHOODS PROMOTED</b>	<b>Indicator 5.1</b> Improved livelihood opportunities	
		5.1.1	Development of co-created livelihoods beneficiation processes
		5.1.2	Small Business incubation
		5.1.3	Employment, training, and career development opportunities
		5.1.4	Leveraging the Community Levy Funds for Vulnerable Groups
		5.1.5	Vulnerable youth support for tertiary education
		<b>Indicator 5.2</b> Community Climate Resource Centre Establishment	
		5.2.1	Community Climate Adaptation Resource Centres Established
		5.2.2	Involvement of communities in sustainable management of Resource centres and associated activities
		5.2.3	Training and awareness at Community Resource Centres
		5.2.4	Child Support
		5.2.5	Libraries
		5.2.6	Computer skills and online courses
		<b>Indicator 5.3</b> Climate Smart Practices Implementation	
		5.3.1	Collation of Traditional Knowledge around existing climate-smart practices
		5.3.2	Establishment of climate-smart homestead-based solutions
		<b>Indicator 5.4</b> Climate-Smart Agriculture	
		5.4.1	Intensive small-scale farmer training and support
		5.4.2	Train the trainer
		5.4.3	Household training and mentorship
		5.4.4	Climate-smart agriculture technique demonstrations
		5.4.5	Facilities to support climate-smart agriculture
		5.4.6	Vulnerable household kitchen garden support



		5.4.7	Collaboration with provincial Department of Agriculture and Rural Development (DARD)
		<b>Indicator 5.5</b> Tourism livelihood opportunities	
		5.5.1	Asset Based Community Development (ABCD) Assessments
		5.5.2	Homestay development and support
		5.5.3	Crafter support
		5.5.4	Craft marketplaces at Hubs
		<b>Indicator 5.6</b> Support for Women	
		5.6.1	Development of a Gender Action Plan for the project
		5.6.2	Women's Leadership training
		5.6.3	Women's Peer support groups
		5.6.4	Gender and GBV Awareness Training
		5.6.5	Gender Assessments
		5.6.6	Young single mother support
<b>6</b>	<b>ENHANCED KNOWLEDGE, EXPERTISE AND CAPACITY OF RELEVANT NATIONAL AGENCIES TO USE EBA APPROACHES FOR CLIMATE-RESILIENT COASTAL ZONE MANAGEMENT</b>	<b>Indicator 6.1</b> EbA Approaches Knowledge-Building	
		6.1.1	Participation in Regional WIO Workshop
		6.1.2	Exchange Visits between EbA projects
		6.1.3	Contribute to online Webinar Series
		6.1.4	International and regional symposia attendance
		<b>Indicator 6.2</b> Publications and Media	
		6.2.1	Community Radio
		6.2.2	Social Media
		6.2.3	Articles
		6.2.4	Media Hosting

		6.2.5	Coastal EbA Case-study Publication and Video
7	STRENGTHENED INSTITUTIONAL AND REGULATORY SYSTEMS FOR CLIMATE-RESPONSIVE PLANNING AND DEVELOPMENT	<b>Indicator 7.1</b> Policy and Legal Instruments	
		7.1.1	Contribute to High-level Strategy and Policy Planning Workshops
		7.1.2	Contribute to development of National EbA implementation Guidelines for the Coastal Zone
		7.1.3	Develop EbA Guidelines for MPA and Estuarine Management Plans
		7.1.4	Comprehensive history, legal and policy review of small-scale fisheries
		<b>Indicator 7.2</b> Institutional and regulatory systems	
		7.2.1	iSimangaliso Climate Resilience Governance Forum
		7.2.2	Carbon Market Trading Incentives
		7.2.3	Small-scale Fisheries Reference Group
		7.2.4	Small-scale Fishers' National Meetings Attendance

### 2.1.3 Project timeframe and budget

The timeframe for the project is 4 years with a proposed start date on 1<sup>st</sup> July 2023 and end date of 30<sup>th</sup> June 2027. The proposed budget total for the project is €6.5 million.

### 2.1.4 Project partners and responsibilities

WILDTRUST is the lead implementing partner for this project, and will report directly to the Blue Action Fund, the funding agency.

Other implementing partners<sup>6</sup> for this project include:

- South African Environmental Observation Network (SAEON)
- Mahlanthini Development Foundation
- Africa Ignite!
- Indalo Inclusive
- Townsville University

Collaborating partners<sup>7</sup> include:

- iSimangaliso Wetland Park Authority (IWPA)
- Ezemvelo KZN Wildlife (EKZNW)
- National Department of Forestry, Fisheries and Environment (DFFE)

The following preapproved subcontractors are to be engaged in the project:

<sup>6</sup> Implementing partners include organisations such as non-government agencies or community-based organisations who have a distinct role in the implementation of the project and who receive funds for delivering outputs as identified in the project document.

<sup>7</sup> Collaborating partners include organisations or individuals with whom the project is collaborating with and who might contribute to a project's outputs but without receiving funds.



- University of KwaZulu-Natal (UKZN)
- Ocean Risk and Resilience Action Alliance (ORRAA)
- Nelson Mandela University (NMU)
- South African Institute for Aquatic Biodiversity (SAIAB)
- Andrew Boraine

#### 2.1.4.1 ESMS responsibilities

Both Blue Action Fund and the grantee are responsible for assessing and managing the project impacts – direct and indirect – caused by activities that are either financed or technically supported by the project. This includes impacts (positive and negative) caused by activities or actors that are financially or technically supported by the project, even when these activities or actors fall outside of the mandate of Blue Action Fund and the grantee. For those activities that are implemented solely by the project (e.g. the grantee or sub-grantees), that would not have happened without the financial support of the project, the project is causing the impact, and has the highest level of responsibility for preventing or mitigating the impacts. For those activities where the project contributes to an existing activity, such as law enforcement that is already being conducted by a government agency, the project is contributing to an impact. Finally, in cases where the project is associated with an activity but is neither causing nor contributing to the activity, then the project is linked to this impact, and has the lowest level of responsibility (Blue Action Fund ESMS Manual, V0.3, 2021).

The lead NGO and Blue Action Fund responsibilities for the application of the Blue Action Fund ESMS include:

The responsibility of **Blue Action Fund** is to:

- Set the Standards and Guidelines that the grantee and its partners must comply with in funded projects;
- Ensure the grantees can apply the requirements of the Blue Action Fund ESMS by: Considering grantee E&S capacities (willingness, technical capacities, previous experience) during the selection grants;
  - Integrating E&S management clauses in the contractual documentation with the grantee;
  - Requiring E&S screening, assessment and development of Safeguard Instruments as part of the project design and grant-making process;
  - Raising awareness of grantees on E&S topics by addressing these topics in meetings between Blue Action and the grantees and in the form of trainings based on real cases encountered in projects;
  - Integrating E&S criteria in the project monitoring process;
  - Providing guidance to grantees regarding conducting E&S Assessments and development and implementation of suitable safeguard instruments/management measures.
- Monitor to what extent E&S risks and impacts are correctly assessed by the grantees at the planning/proposal stage and that subsequent E&S management activities are implemented per this ESMS;
- Monitor the ESMP implementation during all stages of the projects;
- Consolidate reporting on ESMS implementation;
- Collect project lessons learnt to adapt the requirements of this ESMS and its performance in light of the field experiences.

The responsibility of **WILDTRUST** is to:

- Diligently follow the Blue Action Fund ESMS procedures (that apply to grantees), including E&S assessment, and to manage the implementation of their approved Project ESMP and associated Safeguard Instruments throughout project implementation;
- Implement all the management measures and mitigation activities aimed at reducing the negative impacts of the project to acceptable levels and enhancing any positive impacts;
- Ensure compliance with all relevant national legislation and alignment with international good practice, including the World Bank Environmental and Social Framework, the Environmental and Social Standards (ESS) 1-10, the World Bank Group Environmental Health and Safety





Guidelines (EHSGs), the Sustainability Guidelines of KfW Development Bank (2021) and all of those Standards and Guidelines referred to in Section 3 and Annex A.

- Implement the monitoring programmes required to verify that the management measures outlined in the Project ESMP and associated Safeguard Instruments are achieving their expected results. Internal evaluations will be carried out by the grantee on an annual basis;
- Monitor the E&S performance of its contractors and sub-contractors used for providing workforce, supplies and services;
- Conduct public consultation activities necessary to support the implementation of any Safeguard Instruments and to disclose relevant project information to different stakeholders, taking into account data protection regulations;
- Work closely with the host country(ies) government and third-party organisations to initiate necessary capacity building and community development actions;
- Projects shall include clear responsibilities, expertise and resources for the application of the Blue Action Fund Safeguarding Principles and Requirements practice, including an E&S coordinator, E&S expertise commensurate with the nature and significance of the risks and impacts identified, and adequate financial resources for effective E&S assessment and management. Where project staff do not have the necessary relevant skills, expertise and experience, the lead NGO will ensure adequate recruitment, training and capacity building is undertaken. All project staff working on the project should have an awareness of the Blue Action Fund ESMS, the Project ESMP, and associated Safeguard Instruments.
- Report to Blue Action as per the Blue Action Fund annual reporting (into which E&S monitoring has been integrated), on all relevant E&S topics, including serious incidents;
- Report to Blue Action on grievances and complaints issued by the public or other relevant stakeholders of the respective project;
- Report to Blue Action in case a project or an activity within a project has been stopped due to security risks of the workers, the beneficiaries or other stakeholder or due to reputational risk to Blue Action;
- Appoint at least one person for E&S monitoring who is closely familiar with Blue Action Fund's ESMS requirements. This person should be responsible for reporting to Blue Action on E&S topics.

## 2.2 Social context

The aim of this section is to provide a high-level overview of the social context of the project area, including demographics and socio-economic data gathered from primary and secondary sources. This section describes in broad terms the stakeholders and any identified Project Affected People (PAP). Furthermore, this section provides a description of the Sub-Saharan African Historically Underserved Traditional Local Communities in the study area that may be affected/ impacted by the project and its activities. These groups would have been identified as part of the stakeholder identification and analysis process in the Stakeholder Engagement Plan. Lastly, this section provides a description of any Disadvantaged or Vulnerable Groups in the study area that may be affected/ impacted by the Project and its activities.

iSimangaliso Wetland Park is situated in the Province of KwaZulu-Natal, which is the second most populous province in South Africa. Just over 19% of the country's population, or 11.3 million people, live in the province (StatsSA, 2020), which covers 7.5% of the total land area of South Africa. There has been a decline in the share of the country's population living in KwaZulu-Natal since 2007, which reveals that while the province's population is growing, it is growing more slowly than other provinces in SA (StatsSA, 2018).

Large areas of land adjacent to and included in the iSimangaliso Wetland Park and MPA fall under a dual governance system, which includes local and district municipalities, with their associated mandates, and traditional councils. These local level governance systems are nested within provincial and national government with Co-operative Governance and Traditional Affairs (COGTA) responsible for the relationships between Traditional Authorities and municipal governance. Traditional Councils and Traditional Authorities are the dominant form of governance at a local scale at several of the



WILDTRUST livelihood and ecosystem restoration focused Project sites and hence are a key stakeholder in the success of the Project.

The Park falls within the uMkhanyakude District Municipality and borders on the uMfolozi Local Municipality, which forms part of the King Cetshwayo District, to the south. uMkhanyakude District is ranked as the second poorest and most deprived municipality in the country. Over 80% of households live below the poverty line and an estimated 42% of the economically active population is formally employed. Of the district's citizens who are 20 years and older, 57.3% have matric and 3.5% have higher education. HIV prevalence is between 13 and 15% (IMP, 2022-2031). Much of Umkhanyakude District is characterised by remote, but densely settled and poorly serviced communities. High dependency ratios, HIV/AIDS prevalence, high numbers of orphaned children, unemployment and social grant dependency make for highly vulnerable communities. The social impacts of migrancy remain strong – many households are female-headed, or headed by orphaned children (IWPA, 2022).

The people living around iSimangaliso Wetland Park adopt complex livelihood strategies, underpinned by networks of migrant labour wage remittances, state welfare support in the form of pensions, child grants and disability grants, and subsistence agriculture and forestry.

The predominant land uses within the municipalities surrounding the Park include agriculture, mining and commercial timber plantations, conservation/eco-tourism and settlement. Densifying settlements in areas under Traditional Authority governance can be seen along the edges of the park, as a result of the way in which land is allocated through the Ingonyama Trust and Traditional Authorities.

#### *Settlements, Population and Demography*

The landscape within and surrounding the iSimangaliso Wetland Park and MPA is predominantly rural. There are several urban settlements, with the highest settlement densities concentrated at and surrounding the commercial centres of Mtubatuba, Hluhluwe, St Lucia town, Mbazwana and Manguzi. The total population of all local municipalities neighbouring the iSimangaliso Wetland Park and MPA was estimated at 833 453 in 2016, and annual population growth rates are estimated to vary geographically between 1.38% and 3.22% per annum. The number of households inside and surrounding the iSimangaliso Wetland Park and MPA is 181 715, with an average of 4.6 people per household in the district. On average, women make up 54% of the local population.

#### *Education*

Within the uMkhanyakude District, an average of 33% of the population have no formal education. An average of 6.5% of residents has only received primary education and only an average of 3.5% attained a higher educational qualification. A relatively high number of people are receiving a secondary education but are unable to pursue higher level learning due to the poor economic situation in this district and poor-quality education.

#### *Service Levels*

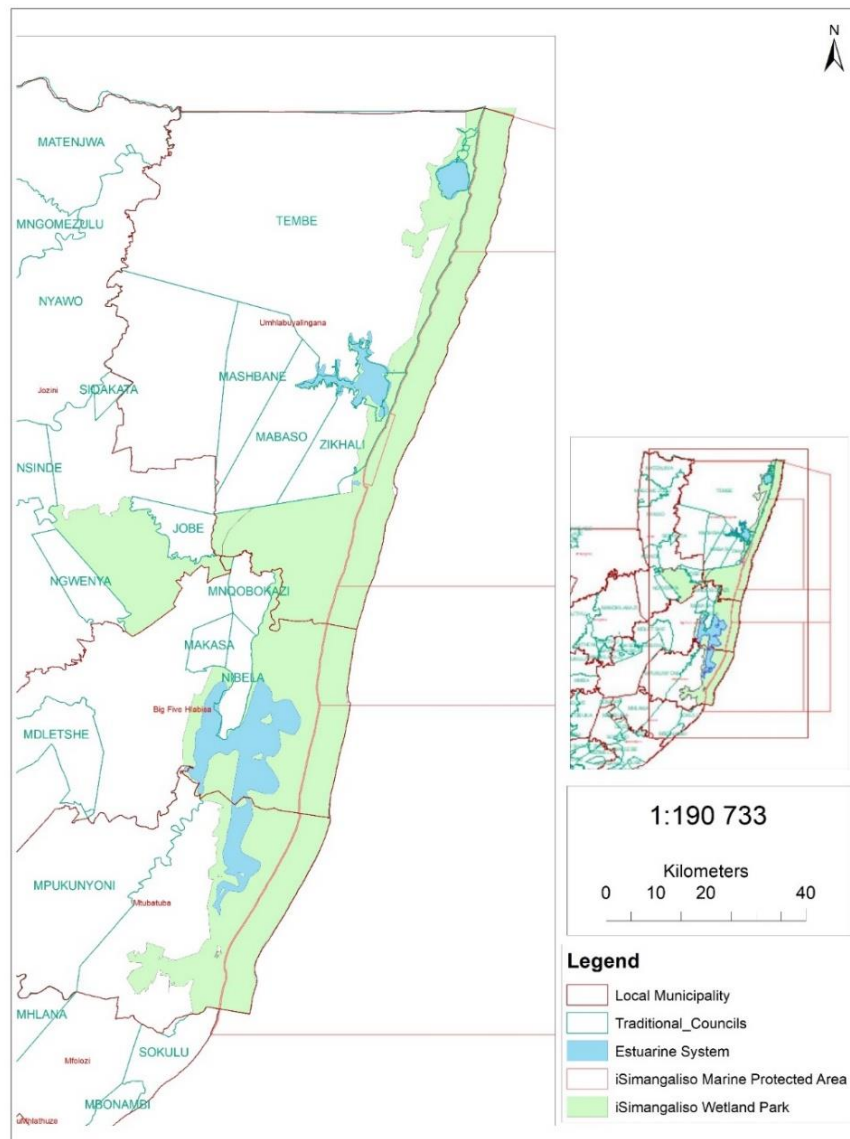
Delivery of services is performed by various organs of state, including national, provincial and local government. Throughout South Africa, rural areas generally experience lower levels of servicing, and the area around iSimangaliso Wetland Park is no different. Provision of and access to services is a major challenge in the study area and reflects the high levels of poverty and inequality and lack of development in the municipalities where the proposed WILDTRUST Project will take place. **Table 4** presents a summary of basic service levels across the five local municipalities within and surrounding the iSimangaliso Wetland Park and MPA (**Figure 3**). Service levels in the southern areas surrounding the Park are generally higher than those in the northern areas.

**Table 4:** Household access to services in Local Municipalities inside and surrounding iSimangaliso Wetland Park (Stats SA Community Survey, 2016)

Service	uMhlabuyalingana	Jozini	Big 5 Hlabisa	Mtubatuba	uMfolozi
Access to electricity	24%	49%	79%	89%	98%

<b>Municipal refuse removal</b>	<1%	6%	3%	9%	12%
<b>Access to safe drinking water</b>	61%	49%	64%	52%	71%
<b>Access to internet</b>	2%	<1%	4%	2%	2%

Individuals in the Community Satisfaction Survey (StatsSA, 2018) were asked to rate the performance of provincial government in ten selected areas including safety and security, food security, health care, basic education and others. The outcomes of the survey revealed the development challenges that citizens believe are not being adequately addressed by provincial government. The challenge of this relative failure of the state is that it creates a context where any project interventions on the landward side of the MPA will be shaped by and placed under pressure to address broader failures and development challenges. These issues all represent a risk to the project in that it cannot address these larger scale structural and governance challenges, but its outcomes will be shaped by them.



**Figure 3:** Map showing the dual governance of Local Municipalities and Traditional Councils in the project area.



### *Energy*

Main towns and settlements are supplied by the national energy provider, Eskom, while programmes are in place to electrify specific rural facilities. There has been an overall improvement in the percentage of households in the region with access to electricity, with 20.1% reporting access in 2001, increasing to an average of 58.5% in 2016 (Stats SA Community Survey, 2016). In areas without access to electricity, households use a combination of energy sources including wood, paraffin, candles, batteries and gas (households with electricity also supplement to some extent with these sources). The use of locally harvested wood resources for cooking and heating has environmental impacts in parts of the iSimangaliso Wetland Park (IWPA, 2022).

### *Water and Sanitation*

Water resources are locally limited and thought to be of insufficient capacity to handle future demand. Around 45% of households in the region only have access to untreated water sources (usually roof rainwater collection, boreholes or stream collection). However, improvements are evident. Between 2001 and 2016, the percentage of households with access to piped water increased from 43% to 50%. The unplanned, dispersed nature of rural settlement makes the provision of piped water to individual households difficult and expensive, and most households that are serviced must collect potable water from communal standpipes (IWPA, 2022). These low levels of service provision have significant implications for the MPA, as lack of water and sanitation services impacts on pollution levels and resource extraction in the catchments and rivers and estuaries. Less than 20% of the population has access to flush toilets in areas within and surrounding the iSimangaliso Wetland Park.

### *Transport*

The region's road network is poor, and apart from the N2 and R22, roads are poorly maintained. This situation affects the provision of public transport, and limits access to larger towns. In large parts of the project area, people can only travel with 4x4 vehicles which makes movement limited and expensive. Rail use is limited to commodities, and there are few commercial flights into the area.

### *Health*

While there is access to district hospitals, there are no regional, central or other hospitals in the district. The situation in the uMfolozi Local Municipality (to the south of the Park) is similar, albeit that there is no hospital within the municipality, the closest being in Hlabisa, Richards Bay and Empangeni. While the majority of households may have access to health facilities, most facilities are under-resourced and oversubscribed due to large catchment populations. Access is also difficult due to poor roads and the high cost of transport. In addition, healthcare is also hampered by the intermittent and unreliable water and electricity supply in rural areas and a shortage of doctors.

### *Economic Status*

Employment is a major challenge in South Africa, with 34% of the population unemployed (StatsSA, 2022). These challenges are endemic and persistent in KwaZulu-Natal with only 49.7% of the population formally employed (Stats SA, 2022). According to the 2011 National Census, households in the uMkhanyakude District are particularly impoverished, with the median average annual household income estimated at R14,600, roughly half the provincial and national averages. Just 17% of the economically active portion of the local population is employed. Of those employed, 69% of workers are in formal employment, 18% in the informal sector, and 9% are employed in private households as domestic workers. There is a heavy reliance on social grants (state pensions, child grants etc.) for survival, alongside the provision of financial support from family members that are living and working in other areas. In the uMfolozi Local Municipality to the south of iSimangaliso Wetland Park, employment levels are marginally better at 22% of the economically active portion of the population being in employment, 73% of which is in formal jobs. The median average annual household income is however only marginally better than the uMkhanyakude District Average, at R15,000 per annum.

## **2.2.1 Stakeholders and Project Affected People**

The list below summarises the key stakeholders in the project area. This includes Sub-Saharan African Historically Underserved Traditional Local Communities, local communities, private sector



actors, civil society organisations and NGOs, and government departments and agencies. **Annexure A**, the Stakeholder Engagement Plan (SEP) provides more details.

- **WILDTRUST project staff**
- **Collaborating Authorities and Partners:** DFFE, iSimangaliso Wetland Park Authority, Ezemvelo KZN Wildlife (EKZNW)
- **Project Livelihood Sub-grantees:** Mahlathini Development Foundation, Africa Ignite!, and Indalo Inclusive
- **Sub-grantees:** South African Environmental Observation Network (SAEON)
- **Local & other Authorities:** Traditional Leadership (Amakhosi and iziNduna), National COGTA, South African Heritage Research Agency (SAHRA), AMAFA Institute, KZN EDTEA, KZN DARD, Tourism KZN, District Municipalities (uMkhanyakude and King Cetshwayo District Municipalities) uMhlosinga Development Agency, Local Municipalities (uMhlabuyalingana, Jozini, Big 5 Hlabisa, Mtubatuba, uMfolozi)
- **Law Enforcement and Security:** Local magistrates, SAPS Marine Unit, SA Navy
- **Research and Monitoring Organisations:** University of KwaZulu-Natal (UKZN), Ocean Risk and Resilience Action Alliance (ORRAA), South African Institute for Aquatic Biodiversity (SAIAB), South African Association for Marine Biological Research (SAAMBR)
- **Rural communities:** Communities, led by Traditional Authorities, within the direct (and partial/indirect) influence of the project, vulnerable/ marginalized groups (women, youth and people with disabilities; and subsistence and small-scale fishers. (See **Box 1** for the list of partner communities).
- **Recreational Users of iSimangaliso MPA:** Recreational Fishers/ Boating Clubs, Tourists, Scuba-Diving individuals
- **Commercial users of iSimangaliso MPA:** Tourism operators inside MPA, Commercial line fishing Operations (off shore) – illegal, SCUBA Diving Concessionaires, Boat charters, Small scale fishers (co-operatives)
- **Civil Society Organisations, Local NGOs and Business Interests:** Media, Private Property Owners/ Developers, Commercialisation investors, Ratepayers/ residents, Conservation NGOs, Ecological / Human Rights Activist Groups, Friends of Small-scale Fishers

**Box 1:** Rural communities supported by the project

**Primary and Secondary Hub Communities**

Tembe Traditional Authority: eNkovukeni, kwaDapha, eMalangeni, kwaNovunya, kwaZibi, kwaMqobela, kwaMpukane, Mabibi

Sokhulu Traditional Authority: eHlawini, eHlanzeni, kwaNtongonya, eThukweni, eMalaleni, kwaManzamyama, kwaHolinyoka

**Peripheral Communities**

Tembe Traditional Authority: kwaMvutshane, kwaMahlungulu, kwaHlomula, kwaMazambane, eManzengwenya

Mbila Traditional Authority: Ezinqeni, eMpini, eQondwane, eSiphahleni, Thungwini

WILDTRUST considers all the populations in **Table 5** as “project affected people” – as defined by Blue Action Funds Glossary of Terms in **Box 2**. The settlements in the project area are listed in **Table 5** and shown in **Figure 3**. Those communities affected by the Project (Affected Communities), totalling 33 communities and 61 584 people are also illustrated on the map (**Figure 2**). **Table 5** provides a breakdown of the affected communities.

**Box 2:** Blue Action Fund ESMS Glossary of Terms: Project Affected Peoples

**Project Affected Peoples**

The term Project Affected People, Project Affected Parties, Project Affected Person or Affected People includes those likely to be affected by the project because of the actual impacts or potential risks to their



physical environment, health, security, well-being or livelihoods. These stakeholders may include individuals or groups, including local communities. *Stakeholders* are referred to separately from *Protect Affected People*, to make a distinction between the broad set of stakeholders who might have an interest in the project (*interested parties*), and those who might be affected (positively or negatively) by the project (*Protect Affected People* or *Project Affected Parties*).

**Table 5:** Communities affected by the Project

Estimated potential degree of affectedness	Total number of communities	Population size
High	15	13 293
Medium	10	14 045
Low	9	36 706
<b>TOTAL</b>	<b>34</b>	<b>64 044</b>

### 2.2.2 WILDTRUST's previous work in the communities in and around iSimangaliso MPA

The section will include a brief summary of the previous work that the WILDTRUST has done in the study area or wider region.

Between July 2019 and ending in June 2022 the WILDTRUST has been implementing the Oceans Alive project, funded through the Blue Action Fund. The following provides a summary of achievements to date.

#### *Improving livelihoods*

The Ocean Alive project has implemented a youth-focused work experience and training program covering the iSimangaliso MPA stakeholder communities, offering over 100 interns per year a 1-year internship contract working at local schools as Teaching Assistants, Environmental Educators, Beach Stewards, Security Guards, Admin Assistants, Caretakers, Gardeners, IT Officers, Admin Assistants, and Operations Officers. This has benefited over 280 youth in iSimangaliso.

To increase the employment rate in iSimangaliso the project conducted an enterprise mentorship and grant support project across the MPA stakeholder community, benefitting 56 sewing beneficiaries and 90 construction beneficiaries. This initiative has helped to register 12 official sewing and construction companies owned by local community members. The 56 sewing business beneficiaries have been offered infrastructure, equipment, grants, materials, mentorship and training to help diversify their sewing skills for more and better employment opportunities in future. As part of the project's approach to participative Community Hub construction, 90 community members from iSimangaliso have been employed to go through a construction skills training and work experience programme. At the end of the work and training experience, they each receive an accredited certificate of completion and a few selected trainees for further mentorship and training on starting their construction businesses. The project has also helped to create several job opportunities for local community members to provide other services relevant to the construction of the Community Hubs. Additionally, the project is currently in the process of developing a financially sustainable community-run and guided multi-day overnight eco-cultural hike through the park, with stay-over nodes in community-run venues, supported by the community Hubs and six trained community guides. This is going to benefit several communities and provide a stable income for many households.

#### *Community Development*

Three Community Resource Hubs have been established in iSimangaliso at Mabibi, KwaDapha and eNkvoukeni. These Hubs have been providing a functional space for the community members,



including young children, to gather for playing, learning, meetings, workshops, events and as well as providing a place for knowledge building and sharing with regards to the conservation of marine biodiversity. The community members also visit the Hubs for several services such as charging cell phones, printing and photocopying and developing and printing their CVs through the assistance of the administrative officers based at the Hubs (and employed from the community). The children often visit the Hubs to complete their homework and for internet connection. During the school holidays, they visit to play games and read books. The games are educational, and they include puzzles, board games, building blocks, etc., to offer exciting, interactive and educational moments to children at the Hubs. The Environmental Educators based at the Hubs interact with and guide the children to ensure their health and safety. The Hubs have become tourist attraction spots with several tourists also coming to visit the Hubs, with some donating books for the children's library. The project also developed and implemented an awareness program focused on developing the local communities' marine conservation and ecosystem adaptation awareness, anchored by weekly activations at the Community Hubs and local schools.

#### *Effective management of the iSimangaliso MPA*

Since the project commenced in 2019, the project has helped to fund the Ezemvelo KZN Wildlife Turtle Monitoring Programme, which has been running since the early 1960s along the KwaZulu-Natal coast in South Africa. Through this support, the project has helped to employ at least 40 turtle monitors annually, promoting community involvement in monitoring & management. The donation of equipment, vehicles, training and the refurbishment of management accommodations has supported monitoring and management capacities of MPA staff.

#### *Improving MPA biodiversity knowledge and understanding*

The Oceans Alive science team and project partners have conducted various offshore ROV, BRUV, and Photic Coral Reef Fish Surveys, and placed Acoustic Telemetry equipment at key sites to improve the understanding of biodiversity patterns and processes of fish and benthic biodiversity on iSimangaliso's shallow and deep reefs, and the animal movement and connectivity between South Africa and Mozambique. Additionally, the data generated from the research surveys are being used to motivate increased protection of endangered species such as Turtle, Sharks and Rays, identify important management zones and assess the efficacy of current zonation and management for the MPA to contribute to fisheries support and tourism experiences. Local fishers and communities have been engaged about the research conducted in the iSimangaliso MPA to provide them with a deeper understanding of the undersea world and highlight the importance of protecting and monitoring key species and ecosystems. This is achieved through storytelling, presentations, films, and photos displayed during the Hub activations, workshops, conferences, and seminars.

### **2.2.3 Disadvantaged or Vulnerable Groups**

Disadvantaged or vulnerable groups<sup>8</sup> 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. Such groups may include ethnic, religious, cultural, linguistic minorities, indigenous groups, female-headed households, children and youngsters, the elderly, persons with disabilities, and the poor. 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

<sup>8</sup> See Blue Action Fund ESMS Glossary of Terms for the definition of Disadvantaged or Vulnerable Groups.

- 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).

The following Vulnerable Groups were identified in the ESA and by the Project Team:

- Subsistence Fishers
- Small-scale Fishers
- People living in extreme poverty (e.g. child-headed households)
- Women
- Youth
- People with disabilities

**Table 6:** Vulnerable Groups and how they might be affected by the project.

Vulnerable Group	Reasons considered vulnerable by the Project	How these groups could be affected by the Project
<b>Subsistence Fishers</b>	Subsistence fishers depend on natural resources from the ocean for food security (protein) and livelihood support.	<ul style="list-style-type: none"> <li>• Potential to be negatively affected as Project brings additional support for effective implementation of the MPA Management plan, which includes enforcement, and which may limit subsistence fishers access to some marine, beach and estuarine zones.</li> </ul>
<b>Small-scale Fishers</b>	The system of formal recognition of Small-Scale Fishers Rights by DFFE, which despite DFFE's best intentions to the contrary, is not inclusive and has resulted in many subsistence fishers not being recognised as eligible for formal fishing rights, and having no choice but to use marine and coastal resources illegally (Mander et al., 2023)	<ul style="list-style-type: none"> <li>• Project brings additional support for effective implementation of the MPA Management plan, which includes enforcement of MPA rules that restrict access to some MPA zones for commercial fishing. Potential to be negatively affected by limiting opportunities for illegal access to fishing waters.</li> </ul>
<b>People living in extreme poverty</b>	Over 80% of households in areas surrounding the iSimangaliso Wetland Park and MPA today live below the poverty line. While the project cannot reach all of these families, the most vulnerable families, e.g. child-headed households, are considered most vulnerable.	<ul style="list-style-type: none"> <li>• The majority of vulnerable households are engaged in subsistence agriculture, foraging and harvesting natural resources, and collecting water and fuel from nature. Project may potentially negatively affect those that are extremely dependent on natural resources harvesting activities in restricted zones in the MPA due to increased enforcement.</li> </ul>
<b>Women</b>	Women were identified as being disproportionately affected by access restrictions, excluded from benefit sharing opportunities, and excluded from MPA developmental processes and project decision making (predominantly due to the strongly patriarchal Traditional Authority governance systems that exist	<ul style="list-style-type: none"> <li>• Disproportionately affected by access restrictions as primary custodians of natural resources in the area</li> <li>• Limited power / access to participation.</li> </ul>



	<p>within the region). Women are the primary custodians of households and natural resources in the area, and yet they most often lack power in political, development, governance and domestic structures. Women are also sometimes the victims of domestic abuse and gender-based violence.</p>	<ul style="list-style-type: none"> <li>• Mechanisms used for Project and MPA Management decision making.</li> <li>• Primarily responsible for domestic household labour.</li> <li>• Could become victims of domestic violence as a retaliation by men who feel threatened by women's empowerment (brought about by the project).</li> </ul>
<b>Youth</b>	<p>In uMkhanyakude District, more than 70% of the unemployed population is younger than 35 years of age. While this is slowly changing, through a strong national drive to support access to opportunities (jobs and education) for youth, in this remote region, characterised by poor road networks and limited development, opportunities for youth that much harder to access. In some instances, youth are still afraid to speak openly in platforms dominated by elders.</p>	<ul style="list-style-type: none"> <li>• Even though this group is less likely to fish and harvest marine resources, they are affected by these restrictions in relation to the <i>principle</i> of access restrictions and how they feel about this in terms of their lives and communities (identities, socially and politically).</li> </ul>
<b>People with disabilities</b>	<p>People with disabilities are still very often marginalised in South Africa, and particularly in impoverished communities where access to resources to aid mobility are extremely limited, and there is a broad lack of general understanding of the special needs of people with disabilities. In 2019, there were 3.5 million reported people living with a disability in South Africa, making up 6.6% of the total population.</p>	<ul style="list-style-type: none"> <li>• Limited physical access to mechanisms for Project and MPA Management decision making.</li> <li>• Limited access to beneficiation brought by the project e.g., community hubs, vegetable gardening.</li> </ul>

## 2.2.4 Sub-Saharan African Historically Underserved Traditional Local Communities

In line with international best practices in Environmental and Social Management Systems (ESMS) for Projects in sub-Saharan Africa countries, Blue Action Fund (BAF) requires that Projects “seek the Free, Prior and Informed Consent (FPIC) from **Indigenous Peoples and sub-Saharan African Historically Underserved Traditional Local Communities** in cases where there are potentially significant adverse impacts, including activities that affect land, natural resources (including marine resources) and cultural resources that are owned or used by Indigenous Peoples. Furthermore, some Projects working with local communities choose to adopt FPIC as best practice<sup>9</sup>”.

The applicability of FPIC requirements to WILDTRUST's application to the Blue Action Fund for the proposed IWP Ecosystem-based Adaptation Project requires an interpretation of the extent to which Indigenous Peoples and Sub-Saharan African Historically Underserved Traditional Local Communities face potential significant adverse impacts from the proposed Project.

The BAF ESMS Glossary of Terms<sup>10</sup> presents the following definition:

*“The term “Indigenous Peoples / Sub-Saharan African Historically Underserved Traditional Local Communities” (or as they may be referred to in the national context using an alternative terminology) is used in a generic sense to refer exclusively to a distinct social and cultural group possessing the following characteristics in varying degrees:*

<sup>9</sup> Extract from BAF Free Informed and Prior Consent Protocol, <https://www.blueactionfund.org/documents-esms/>

<sup>10</sup> [https://www.blueactionfund.org/wp-content/uploads/2021/06/BAF-ESMS\\_Glossary-of-Terms.docx](https://www.blueactionfund.org/wp-content/uploads/2021/06/BAF-ESMS_Glossary-of-Terms.docx)



- a) *Self-identification as members of a distinct indigenous social and cultural group and recognition of this identity by others;*
- b) *Collective attachment to geographically distinct habitats, ancestral territories, or areas of seasonal use or occupation, as well as to the natural resources in these areas;*
- c) *Customary cultural, economic, social, or political institutions that are distinct or separate from those of the mainstream society or culture; and*
- d) *A distinct language or dialect, often different from the official language or languages of the country or region in which they reside.”*

The above definition aligns with similar globally recognised definitions published by the International Labour Organisation (1989), International Union for Conservation of Nature (2017) and World Bank<sup>11</sup>. The World Bank recognizes that the definition and identification of Indigenous Peoples / Sub-Saharan African Historically Underserved Traditional Local Communities may vary from country to country and often reflects national considerations. It has specifically broadened the definition of indigenous peoples to ensure that it encompasses communities or groups of people who, during the lifetime of members of the community or group, have lost collective attachment to distinct habitats or ancestral territories in the Project area because of forced severance, conflict, government resettlement programs, dispossession of their land, natural disasters, or incorporation of such territories into an urban area, as well as to forest dwellers, hunter-gatherers, pastoralists, or other nomadic groups of indigenous peoples<sup>12</sup>.

The Indigenous Peoples of Africa Coordinating Committee<sup>13</sup> (IPACC) (a network of 135 peoples' organisations in 21 African countries), the African Commission's Working Group of Experts on Indigenous Populations/Communities<sup>14</sup> and the International Work Group for Indigenous Affairs<sup>15</sup> all recognise the San and the Khoekhoe as Southern Africa's indigenous peoples. These groups meet the international definition of self-identifying as distinct social and cultural groupings with a collective attachment to geographically distinct habitats, adherence to customary institutions, and practising a distinct dialect or language. The San and Khoekhoe peoples comprise a small percentage of South Africa's population and are located primarily in the Northern, Eastern and Western Cape Provinces. As there are no San or Khoekhoe in the Project area, indigenous peoples as defined in the South African national context are not affected by the proposed Project.

Considering the broader definition of indigenous peoples adopted by BAF however (i.e. including sub-Saharan African Historically Underserved Traditional Local Communities), it is important to consider the applicability of criteria a) through d) listed above. Criteria a) and b) may apply to a greater or lesser extent to the Project affected communities, however, criteria c) and d) do not appear to apply for the following reasons:

- c) – The primary rule of law governing local communities is defined by local Traditional Authorities, which are legally recognised and form part of the national system of governance in South Africa. The 2003 White Paper on Traditional Leadership and Governance<sup>16</sup> sets out the national framework, norms and standards that define the role and the institutions of Traditional Leadership in South Africa. This aligns with South Africa's Constitution, which states that the institution, status and roles of traditional leadership, according to customary law, are recognised. The National Constitution further mandates the establishment of national and provincial houses of traditional leaders which enhance the cooperative relationships

<sup>11</sup> Source: World Bank, ESS7 Fact Sheet. Available at: <https://thedocs.worldbank.org/en/doc/276101511809520481-0290022017/original/EnvironmentalSocialStandardESS7FactSheetWBESF.pdf> [accessed on 12 December 2022]

<sup>12</sup> <https://documents1.worldbank.org/curated/en/972151530217132480/ESF-Guidance-Note-7-Indigenous-Peoples-English.pdf>

<sup>13</sup> <https://www.ipacc.org.za/southern-africa/>

<sup>14</sup> [https://www.iwgia.org/images/publications/African\\_Commission\\_book.pdf](https://www.iwgia.org/images/publications/African_Commission_book.pdf)

<sup>15</sup> <https://www.iwgia.org/en/south-africa/722-indigenous-peoples-in-south-africa>

<sup>16</sup> Available at: [https://www.cogta.gov.za/cgta\\_2016/wp-content/uploads/2017/05/WHITE-PAPER-ON-TRADITIONAL-LEADERSHIP-AND-GOVERNANCE-2003-CO.pdf](https://www.cogta.gov.za/cgta_2016/wp-content/uploads/2017/05/WHITE-PAPER-ON-TRADITIONAL-LEADERSHIP-AND-GOVERNANCE-2003-CO.pdf) (accessed 12 January 2023).



within national and provincial government and deepens relations between municipalities and traditional leaders on customary law and development initiatives<sup>17</sup>.

- d) – The Tsonga and Zulu languages, which are the most common languages spoken by local Project affected communities, are widely spoken in the southern African region, and are included amongst South Africa's 11 official languages. The languages of the San and Khoekhoe – considered to be South Africa's indigenous peoples, and who are not part of the Project affected communities – are not recognised amongst the 11 official languages of the country<sup>18</sup>.

Based on the above, our understanding is that the Project affected communities do not fall neatly within the strict categorisation of “Indigenous Peoples and sub-Saharan African Historically Underserved Traditional Local Communities” as defined in relation to FPIC requirements. However, these communities do have a clear history of economic and social marginalisation, including land dispossession and restricted/loss of access to their ancestral lands, and still remain highly socio-economically vulnerable today. In line with the principles underpinning FPIC, ensuring that the Project does not exacerbate local peoples' marginalisation and contributes positively to reducing vulnerability are therefore critical considerations.

South Africa, due to its apartheid history, and the transformation of its legislative and policy frameworks post democracy in 1994, presents a unique context for the protection of historically underserved / marginalized groups of people (including indigenous people). The post-apartheid democratic state of South Africa is anchored on non-discrimination and the principle of equality. South Africa's National Constitution (1996) principally protects the rights of all citizens, which has been flowed through the country's legislation as part of the comprehensive process of legislative reform which took place following election of the country's first democratic government in 1994.

This highlights the importance of integrating effective mechanisms in the proposed WILDTRUST Ecosystem-based Management Project that speak directly to the nationally legislated principles of inclusive consultation with and safeguarding of vulnerable local communities. The consultation process undertaken as part of the ESA has sought to develop and understanding of local communities' willingness to participate in the Project, and to elicit input on how the Project can be designed and managed to optimise beneficial outcomes for local people. The following will be key in ensuring this is addressed:

- Facilitating deep and meaningful stakeholder consultations which enable Project co-creation and participatory adaptive management approaches (i.e. following ICP processes),
- “Doing things differently” by undertaking meaningful consultation around estuarine and other management plans developed by the Project,
- Supporting the establishment of co-management structures involving local communities, and
- The Project playing a strategic role in building communication and trust bridges between communities and park authorities (IWPA and EKZNW).

### 3 National and International Requirements

WILDTRUST is committed to full compliance with South Africa's legal requirements, Blue Action Fund's ESMS standards, policy and procedures, and international good practice, notably the World Bank Environmental and Social Framework (2017).

#### 3.1 Project's host country requirements

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<sup>17</sup> <https://www.gov.za/about-government/government-system/traditional-leadership> (accessed 12 January 2023).

<sup>18</sup> [https://en.wikipedia.org/wiki/Languages\\_of\\_South\\_Africa](https://en.wikipedia.org/wiki/Languages_of_South_Africa) (accessed 12 January 2023).



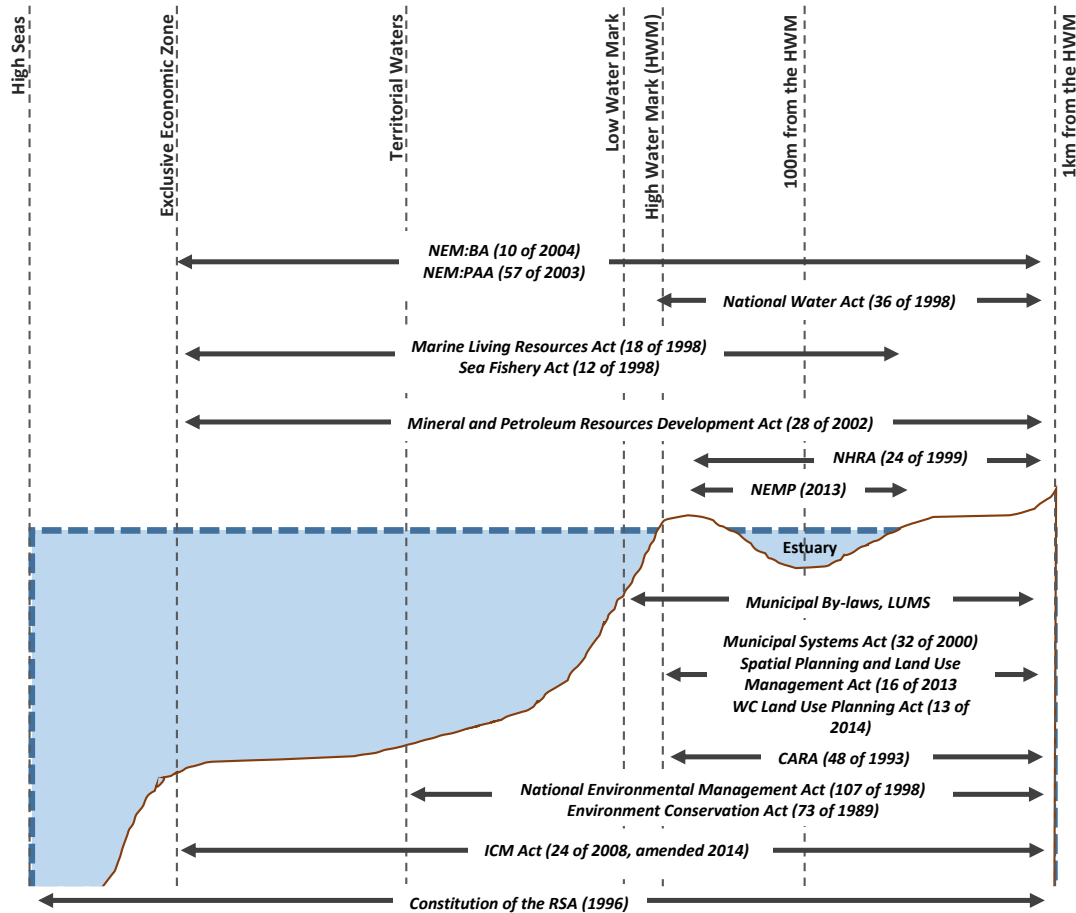
This section describes the national requirements (i.e. legislation, regulations, policies, safeguards, guidelines, etc.) that govern the project. In particular, it will detail what national requirements the project will need to comply with regarding environmental and social impact management as well as stakeholder engagement and disclosure. A description/ analysis of the regional and local institutional framework and legal context will also be provided as a description/ analysis of traditional laws and approaches.

#### *Environmental Governance Structures*

Management of the iSimangaliso Wetland Park World Heritage Site (which includes the iSimangaliso MPA), management has been delegated to the iSimangaliso Wetland Park Authority as per NEM:PAA section 38(1). The iSimangaliso Wetland Park Authority (IWPA) is established under the Regulations proclaiming the World Heritage Site and is statutorily authorised to make conservation and management decisions. The IWPA is responsible for the operations of the IWP and must ensure the environmental and cultural protection of the park and that the values of the World Heritage Convention are respected including managing tourism, creating jobs and implementing the Integrated Management Plan (IMP). The IWPA reports directly to the Minister of Forestry, Fisheries and the Environment. EKZNW is contracted by IWPA to undertake day to day conservation management, policing and enforcement of the regulations, and generally promoting compliance and operates as its service provider. The KZN Tourism Authority is contracted to assist the IWPA with tourism marketing. In addition, the IWPA also has a mandate to enter into co-operative governance agreements with a range of institutions across all spheres of government, including local government, to fulfil its core functions. The rights and duties of the iSimangaliso Authority, EKZNW and the KZN Tourism Authority, with respect to the management and development of the iSimangaliso Wetland Park are regulated through legislation and have been further elaborated through a management agreement signed in August 2001 by these parties. The agreement specifies that the parties will co-operate in meeting Park management objectives.

#### *Legal Framework*

The marine environment is the responsibility of **National Government (DFFE)**, which is responsible for controlling access and use of associated resources. Environmental governance in the coastal zone is much more complex, with multiple laws and actors at different scales responsible for managing natural, built and human environments in coastal areas. **Figure 4** 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**

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

International laws and agreements as well as National Acts and Policies underpin the proclamation of Marine Protected Areas and direct the planning and operational management activities in the MPA. Section 41 of the NEMA: PAA requires that management plans be located within the context of a Coordinated Policy Framework. The legislative instruments outlined below provide the policy framework for Management Planning in the IWP marine environment (Fielding, 2021).

*Global Legal Instruments*

- *The United Nations Law of the Sea* is a binding agreement which provides a comprehensive framework for the governance of the oceans and their resources. States have a general obligation to protect and preserve their marine environment. Coastal States can, with the consent of the International Maritime Organisation (IMO) and without hampering the freedom of navigation of foreign vessels, adopt special measures to reduce the risk of ship-based pollution in specific designated areas.
- *The International Convention for the Prevention of Pollution from Ships (1973)* and its 1978 Protocol together known as MARPOL 73/78 is the principal IMO treaty dealing with the threat of pollution from ships. In 1991 the IMO Assembly adopted Resolution A.720 (17), which allowed for the designation of *Particularly Sensitive Sea Areas (PSSAs)*.
- *The Convention on Biological Diversity* requires States to establish a system of protected areas, to develop, guidelines for the selection, establishment and management of protected areas and to develop national strategies, plans or programmes for the conservation and sustainable use of biological diversity. The *Nagoya Protocol on Access to Genetic Resources and the Fair and Equitable Sharing of Benefits Arising from their Utilization (ABS) to the Convention on Biological Diversity* is a supplementary agreement to the Convention on Biological Diversity. It provides a transparent legal framework for the effective implementation



of one of the three objectives of the CBD: the fair and equitable sharing of benefits arising out of the utilization of genetic resources.

- South Africa is signatory to the *World Summit on Sustainable Development Plan of Implementation (2002)* and is thereby committed to establishing and implementing an ecosystem approach to fisheries (EAF) in the country by 2010.
- *The 2003 World Parks Congress* set specific goals as to the extent of effectively managed, representative networks of marine and coastal protected areas.
- *The Agreement on the Conservation of Albatrosses and Petrels* which South Africa has ratified, places obligations on states to protect habitats that are important for the survival of these species.
- *The FAO Code of Conduct for Responsible Fisheries* is a voluntary instrument which sets international standards and behaviours for governments and other stakeholders to bring about responsible practices for the effective conservation, management and development of living aquatic resources.
- *The International Plan of Action to Prevent, Deter and Eliminate IUU Fishing* is a voluntary instrument which that has been elaborated within the framework of the FAO Code of Conduct for Responsible Fisheries and provides a range of measures for combatting IUU fishing and promoting an integrated approach to address all impacts of IUU fishing.
- *The Global Record of Fishing Vessels, Refrigerated Transport Vessels and Supply Vessels* is a compilation of certified information on vessels involved in fishing operations, providing a tool with which to combat IUU fishing.
- *The Port State Measures Agreement* to which South Africa is a signatory includes all the internationally acceptable measures for port state control of fishing vessels in order to eliminate IUU fishing activities.
- *The African Integrated Maritime Strategy* includes a plan of action to address IUU fishing and reinforces the call for cooperation across states, Regional Economic Communities and Regional Fisheries Management Organisations.
- *The Convention on International Trade in endangered Species of Wild Fauna and Flora (CITES)* which in an international agreement between Governments which ensures that the trade in wild plants and animals does not threaten their survival.

#### *National Legal Instruments*

The current legal framework that directs planning and operational management activities in MPAs is largely contained in the following legislation:

- *The World Heritage Convention Act No. 49 of 1999* provides for the incorporation of the World Heritage Convention into South African law, the enforcement and implementation of the World Heritage Convention in South Africa and the recognition and establishment of World Heritage Sites. It also outlines governance in World Heritage sites.
- *The Constitution of the Republic of South Africa Act, No. 108 of 1996*. Section 24 provides the right to every person for a non-harmful environment and simultaneously mandates the government to protect the environment.
- *The National Environmental Management Act, No. 107 of 1998* (amended 2013) is the statutory framework to enforce Section 24 of the Constitution. It provides for co-operative, environmental governance by establishing principles for decision-making on matters affecting the environment. Driving in the coastal zone and launching boats are controlled under NEMA regulations.
- *The National Environmental Management: Biodiversity Act, No. 10 of 2004* (as amended 2014) provides for the management and conservation of South Africa's biodiversity within the framework of the National Environmental Management Act.
- *The National Environmental Management: Protected Areas Act, No. 57 of 2003* (as amended 2014) provides for the protection and conservation of ecologically viable areas representative of South Africa's biological diversity. MPAs are declared under the National Environmental Management: Protected Areas Amendment Act, 2014.
- *The Marine Living Resources Act, No. 18 of 1998* (as amended 2014) provides for the conservation of the marine environment, the long-term sustainable utilisation of marine living resources and the orderly access to exploitation, utilisation and protection of certain marine living resources.



- *The National Heritage Resources Act, No. 25 of 1999* ensures that the national heritage is conserved and protected.
- *KwaZulu-Natal Heritage Act, No. 4 of 2008* provides for the conservation, protection and administration of both the physical and the living or intangible heritage resources of the Province of KwaZulu-Natal.
- *The Sea Birds and Seals Protection Act, No. 46 of 1973* provides for the protection of sea birds and seals.
- *The National Environmental Management: Integrated Coastal Management Act, No. 24 of 2008* establishes a system of integrated coastal and estuarine management in South Africa which includes norms, standards and policies, in order to promote the conservation of the coastal environment.
- *The Minerals and Petroleum Resources Development Act No 28 of 2002* (amended 2008) makes provision for equitable access to, and sustainable development of, the nation's mineral and petroleum resources.
- *The National Protected Areas Expansion Strategy (2016)* seeks to achieve cost-effective protected areas expansion for improved ecosystem representation, ecological sustainability and resilience to climate change
- *The Disaster Management Act, No. 57 of 2002* provides for: an integrated and co-ordinated disaster management policy that focuses on preventing or reducing the risk of disasters.
- *The Marine Traffic Act 2 of 1981* empowers the Minister of Transport to make regulations that regulate marine traffic in the territorial and internal waters of South Africa.
- *The Maritime Zones Act 15 of 1994* asserts South Africa's right under the United Nations Law of the Sea Convention (LOSC) to a Territorial Sea (12 nautical miles from coast) and an Exclusive Economic Zone (EEZ) extending 200 nautical miles to sea from the coastal baselines.
- *The Marine Pollution (Prevention of Pollution from Ships) Act 2 of 1986* empowers the Minister of Transport to make regulations that give effect to the MARPOL 73/78 Convention.
- *The Marine Spatial Planning Act No. 16 of 2018* provides a framework for marine spatial planning in South Africa.
- *The Public Finance Management Act No. 1 of 1999* regulates financial management in the national and provincial governments to ensure that all revenue, expenditure, assets and liabilities of those governments are managed efficiently and effectively.
- *The Spatial Planning and Land Use Management Act (SPLUMA) 16 of 2013* which allows the Department of Rural Development and Land Reform (DRDLR) to pass regulation related to land development and land use.
- *Local Government: Municipal Structures Act, No. 117 of 1998* divides South Africa into various local government structures (metropolitan or district and local municipalities), and assigns them powers and functions
- *The Local Government: Municipal Systems Act 32 of 2000* which defines the legal nature of municipalities as part of a system of co-operative government and requires the preparation of an Integrated Development Plan.
- *The Intergovernmental Relations Framework Act (IGRF) 13 of 2005* which establishes a framework for the national, provincial and local government to interact.
- *The Bioprospecting, Access and Benefit Sharing (BABS) Regulations, 2008* made under the National Environmental Management Biodiversity Act (NEMBA), Act 10 of 2004

#### *Other legislation, plans and policies*

- Integrated Development Plans (IDPs) for the uMkhanyakude and King Cetshwayo District Municipalities
- IDPs for the five local municipalities adjacent to the Park (uMhlabuyalingana, Jozini, The Big Five Hlabisa, Mtubatuba and uMfolozi LMs).
- KZN Provincial Growth and Development Strategy, 2035 (2016) outlines the primary growth and development strategy for KwaZulu-Natal to 2030.
- KwaZulu-Natal Conservation Management Act (Act No. 9 of 1997)

## **3.2 International requirements**



This section describes the international good practice standards that govern the project, notably the World Bank Environmental and Social Framework (2017).

The Blue Action Fund requires all of its projects to be compliant with the World Bank Environmental and Social Framework (WB ESF 2017), including the Environmental and Social Standards (ESS) 1-10, the World Bank Group Environmental Health and Safety Guidelines (EHSGs), and the other Standards and Guidelines listed in Annex A of the Blue Action Fund ESMS Manual. These Standards are aimed at providing guidance on how to identify risks and impacts, and are designed to help 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 ESMS 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

Adherence to these Principles and Requirements places an emphasis on ensuring adequate public consultation and disclosure is carried out so that Affected Communities are fully informed about the project and their views and concerns are taken into account. The Blue Action Fund and all of its projects are committed to this. Stakeholder engagement shall be conducted on the basis of timely, relevant, understandable and accessible information, provided in a culturally appropriate format, as described in the Stakeholder Engagement Plan (SEP) appended to this document.

### 3.2.1 Gap analysis

WILDTRUST has conducted a preliminary review of the South African legislation that pertains to the project, and this is documented in **Table 7** which presents a summary of some of the gaps identified, and the project's strategy to address these. Furthermore, in relation to Principle 5 (and WB ESS5), some specific gaps identified include:

- Social baseline surveys: there is no legal requirement to establish socioeconomic baselines as part of MPA establishment. The project has however already completed social baselines across the majority of the project community implementation sites and will conduct further baselines in new communities at the start of this new project.
- Eligibility and entitlements: PAPs are not entitled to compensation in the light of access restrictions due to the establishment of an MPA. As such, livelihood restoration will be planned carefully with IWPA to ensure that there are not major disparities across communities within the MPA.



**Table 7: Gap Analysis**

<b>Blue Action Fund requirements</b>	<b>National Legislative Requirements</b>	<b>Gap</b>	<b>Strategy</b>
Principle 1: E&S assessment and risk management (relates to WB ESS 1)	No EIA required unless major infrastructure. PDAI and PAJA observed in MPA establishment.	No ESIA per se, but PAJA accounts for respect for peoples' rights	Conduct E&S assessment, and SE baselines and other SE to identify potential impacts; work with IWPA and EKZNW on identified impacts as per PF.
Principle 2: Stakeholder engagement (relates to WB ESS 10)	NEMPA (2003) public consultation process in line with PAJA. Management plan consultation process.	Accessibility of consultations (language; transport; information)	Support IWPA with the engagement process.
Principle 3: Health, safety and security of communities and project personnel (relates to WB ESS 2 and 4)	NEMA (1998) on law enforcement; EKZNW Policies on law enforcement (firearms, use of force etc.) aligned with legislation;	Appears compliant but potential for gaps	Compliance check with Blue Action law enforcement guidance e.g., Voluntary Principles and BAF ESMS requirements.
Principle 4: Resource efficiency and biodiversity (relates to WB ESS 3 and 6)	NEMA (1998); NEMBA (2004); NEMPA (2003)	None identified	N/A
Principle 5: Livelihoods and access restrictions (relates to WB ESS 5)	PAJA (2000); NEMPA (2003) for public consultation.	Baseline surveys; cut-off dates; livelihood restoration entitlements.	Development of a project Final Process Framework
Principle 6: Gender equity and vulnerable groups (all of the WB ESF)	Constitution (1996)	None identified	N/A
Principle 7: Cultural Heritage (relates to WB ESS 8)	KZN Heritage Act, 1997	None identified	N/A
Principle 8: Indigenous Peoples (relates to WB ESS 7)	Constitution (1996); White Paper on Traditional Leadership and Governance (2003)	No indigenous peoples affected by the project; however local communities have a long history of marginalization and are socio-economically vulnerable	Facilitate inclusive stakeholder consultations, including airing of past community grievances; support communication and trust building between communities, IWPA and EKZNW
Principle 9: Grievance Management (relates to WB ESS 10)		No requirement for a grievance management within Protected Areas	Establish project Grievance Mechanism (Annex 1)
Principle 10: Human Rights (relates to BMZ guidelines on Human Rights)	Constitution (1996)	None identified	N/A

## 4 Risk Management Strategy

While the sections above serve to introduce the Project and include common sections that are normally duplicated in each Safeguard Instrument (which is not the case here, as the ESMP is the



umbrella Safeguard Instrument), this section includes the identified risks and impacts, and the strategy to manage these risks and impacts.

Owing to the provisional nature of this ESMP, the plan will be further updated within the first six months of project implementation in line with an update of the other Safeguard Instruments (e.g., Stakeholder Engagement Plan, Grievance Mechanism, etc.). Further major updates to the ESMP will be made on an annual basis, in parallel with project annual reporting described in Section 5 below.



Table 8: 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
<b>Principle 1:</b> E&S assessment and risk management (relates to WB ESS 1)	<input checked="" type="checkbox"/> yes Low 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 conflict in relation to human rights and law enforcement. To further improve the assessment of risks and impacts, the project will conduct a legal reviews and gap analysis between relevant South African Law and international BAF-aligned safeguarding principles, as well as a review of EKZNW's law enforcement SOPs and the completion of a security risk assessment in the Inception phase of the project. The project will also complete both socioeconomic and ecological baseline surveys during the first year of the project. Risks will be managed through the activities detailed in <b>Table 9</b> below. The project will monitor E&S risks and impacts via the <b>ESMP</b> and associated safeguards: <b>Stakeholder Engagement Plan, Grievance Mechanism, Process Framework, and Gender Action Plan.</b>
<b>Principle 2:</b> Stakeholder engagement (relates to WB ESS 10)	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no Moderate 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 risks in relation to stakeholder consultation & engagement have been identified, and a project <b>Stakeholder Engagement Plan</b> has been formulated. Risks are largely associated with the historic tensions between the Park Authority, IWPA, and communities and a history of poor stakeholder engagement along with legacy land tenure issues. This SEP includes engagement activities the project will undertake and activities the project will support IWPA and communities with.
<b>Principle 3:</b> 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 IWPA LE staff and community members, due to use of vehicles and boats, presence of dangerous animals, hub construction and potential confrontations with people in the project focus areas. Crime also poses a threat to project staff. Risks related to law enforcement include the potential for escalated community-MPA tensions and potential for conflict between law enforcement personnel and communities. Management measures are included in <b>Table 9</b> below.
<b>Principle 4:</b> Resource efficiency and biodiversity (relates to WB ESS 3 and 6)	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no Low 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), restoration and rehabilitation risks (e.g. non-alignment with other LandCare programmes), and unintentional investment in maladaptive interventions that increase peoples' exposure to



		food insecurity and other climate change related risks e.g. agriculture activities do not take into account the effects of climate change have been identified. Management measures are included in <b>Table 9</b> below.
<b>Principle 5:</b> Livelihoods and access restrictions (relates to WB ESS 5)	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no Substantial risk	Potential for support for management of 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 restrictions on access already exist due to the existing MPA, Nature Reserves and other land uses (e.g. plantation forestry). A <b>Preliminary Process Framework</b> has been designed to guide the Project Inception period, including socioeconomic baselines and support to IWPA's stakeholder engagement process.
<b>Principle 6:</b> Gender equity and vulnerable groups (all of the WB ESF)	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no Moderate risk	Risks identified include the potential for unequal benefit sharing among men and women, causing psychological stress or conflict; potential for women and vulnerable groups to be excluded from engagement around MPA planning, and decision making and potential for women and vulnerable groups to be more adversely affected by improved implementation of legal restrictions on natural resource access. There is also the risk of failure to direct livelihood interventions to vulnerable groups and/or conflict caused by directed beneficiation towards vulnerable groups. Measures included in the Stakeholder Engagement Plan and Preliminary Process Framework to ensure inclusion during impact assessments and planning of project activities/mitigation measures. Management measures included in <b>Table 9</b> .
<b>Principle 7:</b> Cultural Heritage (relates to WB ESS 8)	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no Low risk	Enforcement of access and use restrictions may impact cultural uses of the iSimangaliso Wetland Park and MPA, such as medicinal plant / product harvesting and for recreation. Development of Community Hubs is deemed to have a negligible potential negative impact on cultural heritage and does not require a Chance Find Procedure. Management measures included in <b>Table 9</b> .
<b>Principle 8:</b> Indigenous Peoples (relates to WB ESS 7)	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no Low risk	Not applicable. The project does not consider that the coastal communities in IWP meet the international definition of Indigenous Peoples.  However, given some overlap with the categorisation of Sub-Saharan African Historically Underserved Traditional Local Communities, careful attention has been given to the stakeholder engagement and human rights principles for these groups. Management measures included in <b>Table 9</b> .



<p><b>Principle 9:</b> Grievance Management (relates to WB ESS 10)</p>	<p><input checked="" type="checkbox"/> yes  <input type="checkbox"/> no                  Low risk</p>	<p>Existing unresolved grievances between stakeholders and the Park Authorities could threaten project outcomes, including grievances around access restrictions, boundaries of the park, law enforcement, land claims, and stakeholder engagement. Potential grievances could relate to project staff and activities and to the broader MPA (e.g. zoning, regulations, law enforcement). A project-level Grievance Mechanism has been designed (Annex B), and the project will work with IWPA to develop an MPA level Grievance to receive and resolve those grievances that are within IWPA's mandate. Management measures included in <b>Table 9</b>.</p>
<p><b>Principle 10:</b> Human Rights (relates to BMZ guidelines on Human Rights)</p>	<p><input checked="" type="checkbox"/> yes  <input type="checkbox"/> no                  Substantial risk</p>	<p>Risks include injury or death caused to park law enforcement officials funded by the project in the line of duty, as well as risk of harm to community members / poachers. There is a risk to women's rights being violated through GBV, a risk of perpetuating possible/perceived human rights issues in relation to customary fishing rights and increasing economic displacement caused by improved enforcement of legislated restrictions. An additional security risk assessment is being conducted and further details will be provided in the projects Process Framework. Management measures included in <b>Table 9</b>.</p>



**Table 9: Risk and impact management measures**

Social and environmental risks and potential impacts <sup>19</sup>	Management measures <sup>20</sup>	Feasibility, effectiveness and sustainability <sup>21</sup>	Location	Costs	Implementation responsibility	Schedule
<p><b>Principle 1:</b> E&amp;S assessment and risk management (relates to WB ESS 1)</p> <p>Changing risks in the project life cycle not identified / addressed.</p> <p>Feedback from ESA not filtered to relevant stakeholders and knowledge remains with WILDTRUST limiting systemic change.</p> <p>Media misinterpreting local circumstances and causing additional conflict.</p>	<p>Development of project <b>ESMP and associated safeguards</b>. And including:</p> <ol style="list-style-type: none"> <li>1) Monitoring and evaluation of the project ESMP [ESMS function]</li> <li>2) Annual re-screening of risks and impacts using the BAF E&amp;S tool [ESMS function]</li> <li>3) Outcomes of ESA, Baselines and Safeguards shared with key stakeholders (including Staff, Park Authorities and communities in a culturally appropriate and user-friendly way and using local language where needed (<i>Activities 1.7.1, 2.1.2 and 1.1.4</i>).</li> <li>4) WILDTRUST to strategically engage the media, arrange site visits and encouraging accurate (or at least balanced) reporting of events (<i>Activities 6.2.1-6.2.5</i>).</li> </ol>	<ol style="list-style-type: none"> <li>1) ✓</li> <li>2) ✓</li> <li>3) ✓</li> <li>4) ✓</li> </ol>	<p>1)-4) MPA Level</p>	<ol style="list-style-type: none"> <li>1) Staff time</li> <li>2) Staff time</li> <li>3) Staff time and travel, budget allocations for <i>Activities 1.7.1, 2.1.2 and 1.1.4</i>.</li> <li>4) Staff time, travel costs, budget allocations for <i>Activities 6.2.1-6.2.5</i></li> </ol>	<ol style="list-style-type: none"> <li>1) ESMS team, WILDTRUST</li> <li>2) ESMS team, WILDTRUST</li> <li>3) ESMS team project team, WILDTRUST</li> <li>4) Communications Team, WILDTRUST</li> </ol>	<ol style="list-style-type: none"> <li>1) Quarterly</li> <li>2) Annually</li> <li>3) Year 1, 3<sup>rd</sup> Quarter</li> <li>4) Annually</li> </ol>
<p><b>Principle 2:</b> Stakeholder engagement (relates to WB ESS 10)</p>	<p>Development of Project <b>SEP</b> [ESMS function], including:</p>	<ol style="list-style-type: none"> <li>1) This is a trial measure. IWPA</li> </ol>	<p>1) MPA Level</p>	<ol style="list-style-type: none"> <li>1) Staff time, and travel, budget</li> </ol>	<ol style="list-style-type: none"> <li>1) ESMS and Project leadership</li> </ol>	<ol style="list-style-type: none"> <li>1) Year 1</li> </ol>

<sup>19</sup> Each row has a different social and environmental risks and impact (e.g., one row includes potential social impacts due to access restrictions from no-take zones, while another row could include risks to project staff due to boat operations in hazardous conditions. If management measures are not to be included in a stand-alone plan (e.g. a Process Framework), the management measures need to be described in this table. If a stand-alone plan is to be used, this can simply be referred to.

<sup>20</sup> Management measures should be conceptualised as project activities: this needs to be specified and cross referenced to the Logframe (e.g. “see Activity 1.2.3”) to ensure that the Project has included and budgeted these activities.

<sup>21</sup> The ESMP must confirm that proposed management measures are feasible, that they are effective in providing management/ mitigation for all affected groups and that they are sustainable. In cases where this is not the case (e.g. when a management measure is being trialled), this should be noted.



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Social and environmental risks and potential impacts <sup>19</sup>	Management measures <sup>20</sup>	Feasibility, effectiveness and sustainability <sup>21</sup>	Location	Costs	Implementation responsibility	Schedule
<p>The existing damaged relationships between Park Authorities (IWPA &amp; EKZNW) and local communities could cause distrust of WILDTRUST (by association).</p> <p>Poor history of stakeholder engagement in the area, particularly between authorities and local communities continues, undermining progress of project outcomes.</p> <p>WT runs a parallel SE process which is not sustainable at the end of the project.</p>	<p>1) Project to create and support implementation of platform for dialogue and trust between IWPA and rural community stakeholders for a shared vision, common agenda, and joint action partnership (<i>Activity 1.1.1</i>)</p> <p>2) WT to engage with IWPA and informed stakeholders around planned EMP, MP and any other relevant public participation processes to provide guidance to authorities on best practice engagement on these processes and empower communities to engage through capacity building, including the formulation of community engagement principles to ensure the voices of youth, women, and any identified vulnerable affected user groups are heard (<i>Activities 1.1.2 and 1.1.4</i>).</p> <p>3) Provide extension support to IWPA to support stakeholder engagement efforts and to ensure consultation extends beyond community representatives (e.g., traditional leadership) and reaches community members &amp; affected resource users, among others. Efforts to ensure integrated approaches and collaborative efforts around MPA SE to ensure sustainability of SE approaches. (<i>Activities 1.1.1-1.1.4</i>).</p> <p>4) Ensure all WT processes demonstrate best-practice stakeholder engagement to demonstrate how SE can be done differently, and record outcomes to monitor and evaluate effectiveness (ref <b>SEP</b>). This includes alignment to best practice principles for working with Sub-Saharan African Historically Underserved</p>	<p>support has been secured. EKZNW and Community support still to be secured but it is anticipated that if approached correctly, support will be secured.</p> <p>2) Trial measure, well-resourced and informed.</p> <p>3) Trial measure. Relationships and necessary foundations established.</p> <p>4) ✓</p> <p>5) ✓ - Some new mechanisms to establish</p>	<p>2) Community level</p> <p>3) MPA level</p> <p>4) MPA level</p> <p>5) Project level</p> <p>6) Project level</p> <p>7) MPA level</p> <p>8) MPA and community level</p> <p>9) MPA level</p>	<p>allocations for <i>Activity 1.1.1</i>.</p> <p>2) Staff time and travel; budget allocations for <i>Activities 1.1.2 and 1.1.4</i></p> <p>3) Staff time and travel and budget allocations for <i>Activities 1.1.1-1.1.4</i></p> <p>4) Staff time and budget allocations from <i>Activity 1.8.1 – 1.8.2</i>.</p> <p>5) Staff time and travel, budget allocations for <i>Activities 1.1.3, 7.2.1 &amp; 7.2.3</i>.</p>	<p>team, WILDTRUST</p> <p>2) ESMS and Project leadership team, WILDTRUST</p> <p>3) ESMS and project team, WILDTRUST</p> <p>4) ESMS Team, Project Community Team, WILDTRUST</p> <p>5) Project Team, WILDTRUST</p> <p>6) Project Team, WILDTRUST</p> <p>7) ESMS and SE Officer, WILDTRUST</p> <p>8) ESMS and SE Officer, WILDTRUST</p>	<p>2) Year 1-4 as needed.</p> <p>3) Year 1 - 4</p> <p>4) Year 1 – 4</p> <p>5) Year 1</p> <p>6) Inception Phase</p> <p>7) Year 1</p> <p>8) Inception Phase</p> <p>9) Year 1 - 4</p>



**Table 9: Risk and impact management measures**

Social and environmental risks and potential impacts <sup>19</sup>	Management measures <sup>20</sup>	Feasibility, effectiveness and sustainability <sup>21</sup>	Location	Costs	Implementation responsibility	Schedule
	<p>Traditional Local Communities' wherever possible (<i>Activity 1.8.1 &amp; 1.8.2</i>).</p> <p>5) Facilitate the establishment of identified mechanisms/ forums (ref <b>SEP</b>), including reference groups and multi-level governance forums (<i>Activities 1.1.3, 7.2.1 &amp; 7.2.3</i>)</p> <p>6) Engage translation services for translation of all key MPA documents into isiZulu; translation of all relevant project information, and ongoing translation and user-friendly interpretation of project and MPA documents to support stakeholder engagement (<i>Activities 1.1.4 and 1.7.1</i>)</p> <p>7) Co-creation of ICP process with Park Authorities and community stakeholders, especially fishers and vulnerable groups) to ensure community are satisfied with the level and type of engagement with the project (<i>Activities 1.1.1 – 1.1.4 &amp; 1.8.1</i>).</p> <p>8) Consultations with beneficiary communities to develop local-level beneficiation strategies that ensure PAPs and vulnerable groups benefit without causing conflict (<i>Activity 5.1.1</i>)</p> <p>9) Development of culturally relevant, user-friendly communications material to clarify roles and responsibilities inside the Park (e.g. DFFE, IWPA, EKZNW) (<i>Activities 1.1.4 and 1.7.1</i>)</p>	<p>but WILDTRUST has extensive experience and reach in this regard.</p> <p>6) ✓</p> <p>7) Trial measure.</p> <p>8) Trial measure but strong foundations built.</p> <p>9) ✓</p>		<p>6) Staff time &amp; budget allocations for <i>Activities 1.1.4 and 1.7.1</i>.</p> <p>7) Staff time and travel and budget allocations for <i>Activities 1.1.1 - 1.1.4 &amp; 1.8.1 – 1.8.2</i>.</p> <p>8) Staff time and travel; budget allocations for <i>Activity 5.1.1</i>)</p> <p>9) Staff time and travel; budget allocations for <i>Activities 1.1.4 and 1.7.1</i></p>	<p>9) Communications and ESMS teams, WILDTRUST</p>	





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<p><b>Principle 3:</b> Health, safety and security of communities and project personnel (relates to WB ESS 2 and 4)</p> <p>Enforcement of MPA resource use restrictions was linked to the potential for human rights contraventions and use of force, with associated health and safety concerns (for both LE officers and recipients of LE). <b>See Principle 10.</b></p> <p>Occupational H&amp;S risks – snake bites, vehicle accidents (and night driving), hijacking etc.</p> <p>Project causes conflict in the community due to expectations of employment and who gets to benefit creating a direct safety threat &amp; psychological stress to community members and staff.</p>	<p>Over and above legal compliance:</p> <ol style="list-style-type: none"> <li>1) GAP analysis conducted to assess EKZNW’s Law Enforcement policies, and recommendations made to EKZNW and any necessary training provided (<i>Activity 1.8.1</i>).</li> <li>2) All OH&amp;S in accordance with national legislation and all staff trained accordingly (as per WILDTRUST policies and procedures).</li> </ol> <p>Existing policies:</p> <ul style="list-style-type: none"> <li>• WILDTRUST vehicle policy (including boats);</li> <li>• WILDTRUST Policies and Procedures;</li> <li>• H&amp;S training for Vehicles and Boat Operations;</li> </ul> <ol style="list-style-type: none"> <li>3) Strong SE with community partners to ensure strong relationships and fair beneficiation to avoid any potential conflict. See <b>Principle 2</b> and <b>SEP</b>.</li> <li>4) Environmental and Social Code of Practice (ESCOP) and EIA completed for resource Centre construction (labour, H&amp;S) (<i>Activity 5.2.1</i>);</li> <li>5) EKZNW LE SOPs (see also management measure 1 – to be assessed under legal review)</li> <li>6) Legal compliance training for MPA staff (<i>Activity 1.3.1</i>)</li> </ol>	<ol style="list-style-type: none"> <li>1) √ (consultants with legal expertise)</li> <li>2) √</li> <li>3) √</li> <li>4) √</li> <li>5) √</li> <li>6) √</li> </ol>	<ol style="list-style-type: none"> <li>1) Project Level</li> <li>2) Project Level</li> <li>3) MPA Level</li> <li>4) Project Level</li> <li>5) Project level</li> <li>6) Project level</li> </ol>	<ol style="list-style-type: none"> <li>1) Consultant Fees</li> <li>2) Budget allocations for training providers costs for SHE Rep, H&amp;S, first Aid, snake awareness; water safety, 4x4, advanced driver training &amp; anti-hijacking/ criminal threats of hijacking, armed robbery and other violent crimes.</li> <li>3) See <b>Principle 2</b>.</li> <li>4) Budget allocations in</li> </ol>	<ol style="list-style-type: none"> <li>1) ESMS team, WILDTRUST</li> <li>2) Project Manager &amp; HR department, WILDTRUST</li> <li>3) Project Manager, SE Coordinator and ESMS Team, WILDTRUST</li> <li>4) ESCOP – ESMS team; EIA – Project Team, WILDTRUST</li> <li>5) EKZNW</li> <li>6) Project Team</li> </ol>	<ol style="list-style-type: none"> <li>1) Inception phase</li> <li>2) Years 1 – 4</li> <li>3) Years 1 – 4</li> <li>4) Prior to Hub construction</li> <li>5) Existing</li> <li>6) Year 1 &amp; Year 3</li> </ol>



**Table 9: Risk and impact management measures**

Social and environmental risks and potential impacts <sup>19</sup>	Management measures <sup>20</sup>	Feasibility, effectiveness and sustainability <sup>21</sup>	Location	Costs	Implementation responsibility	Schedule
Risk of unrest (as seen before in KZN riots in 2021)				Activity 5.2.1. 5) Budget allocations in Activity 1.8.1. 6) Budget allocations in Activity 1.3.1		
<p><b>Principle 4:</b> Resource efficiency and biodiversity (relates to WB ESS 3 and 6)</p> <p>Field-based work causing negative impact on sensitive ecosystems.</p> <p>Failure to recognise that the MPA needs to be managed as part of a broader landscape and marine ecosystem which could result in the project activities not achieving the desired ecological protection and management outcomes.</p> <p>The potential for natural resource harvesting activities shifting from restricted zones in the MPA to alternative</p>	<p>Over and above legal compliance:</p> <p>1) WT facilitating the research and monitoring gap to provide science based for management decision making (<i>Activities 2.1.1, 3.1.1, 3.2.1, 3.3.1, 4.1.1, 4.2.1, 7.1.2-3</i>)</p> <p>2) Ensure that proposed riparian restoration complements and does not overlap with or duplicate similar LandCare funded activities in the protected area through consultations with IWPA and EKZN prior to inception of restoration activities.</p> <p>3) Consider river catchments when formulating management interventions for MPA – requiring accountability and co-operation across relevant government departments that regulate activities that drive negative impacts.</p> <p>4) Inclusion of traditional knowledge and respect for traditional knowledge systems and practices in</p>	<p>1) ✓</p> <p>2) ✓</p> <p>3) ✓</p> <p>4) Trial measure but strong organisational capacity exists.</p> <p>5) Trial measure, but strong organisational capacity exists.</p> <p>6) ✓</p> <p>7) ✓</p>	<p>1) MPA level</p> <p>2) MPA level</p> <p>3) Project level</p> <p>4) Community level</p> <p>5) Community level</p> <p>6) MPA level</p> <p>7) Project level</p>	<p>1) Budget allocations in <i>Activities 2.1.1, 3.1.1, 3.2.1, 3.3.1, 4.1.1, 4.2.1, 7.1.2-3</i></p> <p>2) N/A</p> <p>3) N/A</p> <p>4) Staff time and travel and budget allocations for <i>Activities 3.1.2, 3.2.3, 3.3.3.</i></p> <p>5) Staff time and travel and budget</p>	<p>1) Project team, WILDTRUST, and relevant partners.</p> <p>2) Project team, WILDTRUST, and ecologists at IWPA &amp; EKZNW.</p> <p>3) Project team, WILDTRUST, and ecologists at IWPA &amp; EKZNW.</p> <p>4) Project Manager &amp; SE</p>	<p>1) Year 1 – 4</p> <p>2) Inceptions Phase</p> <p>3) Throughout the project lifecycle</p> <p>4) Before inception of restoration work.</p> <p>5) Inception phase</p> <p>6) Year 1</p> <p>7) Prior to development of each hub</p>



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Social and environmental risks and potential impacts <sup>19</sup>	Management measures <sup>20</sup>	Feasibility, effectiveness and sustainability <sup>21</sup>	Location	Costs	Implementation responsibility	Schedule
<p>sites, with associated impacts.</p> <p>Failure to properly plan the Project ecosystem restoration activities may result in overlaps with IWPA’s own management / restoration programmes.</p> <p>Sensitive natural areas being damaged or transformed by the agricultural activities.</p> <p>Unintentional investment in maladaptive interventions that increase peoples’ exposure to food insecurity and other climate change related risks e.g., agricultural activities do not take into account the effects of climate change.</p> <p>Agricultural activities inside the park cause confusion, exacerbate ecologically threatening agricultural practices in the park and spark further conflict between IWPA and the communities.</p>	<p>estuarine and riparian restoration (<i>Activities 3.1.2, 3.2.3, 3.3.3</i>).</p> <p>5) Proactive governance and management of estuaries needs to include a strong focus on meaningful participation (including stewardship) of local communities that depend on estuaries for natural resource harvesting and fishing (<i>Activity 1.1.2</i>).</p> <p>6) Review of Park Land Use Plans, in collaboration with park ecologists and communities before any agricultural activities commence inside the Park (<i>Activity 5.4.1</i>).</p> <p>7) EIAs conducted before hub development and sites selected by communities (<i>Activity 5.2.1</i>)</p>			<p>allocations for <i>Activity 1.1</i>.</p> <p>6) Staff time</p> <p>7) Budget allocations for <i>Activity 5.2.1</i></p>	<p>Coordinator, WILDTRUST</p> <p>5) Project Manager &amp; SE Coordinator, WILDTRUST</p> <p>6) Project Team, WILDTRUST and ecologists at IWPA &amp; EKZNW.</p> <p>7) Consultants</p>	



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Social and environmental risks and potential impacts <sup>19</sup>	Management measures <sup>20</sup>	Feasibility, effectiveness and sustainability <sup>21</sup>	Location	Costs	Implementation responsibility	Schedule
Risks of environmental impact during hub development.						
<p><b>Principle 5:</b> Livelihoods and access restrictions (relates to WB ESS 5)</p> <p>Existing restrictions supported by the project through marine and estuarine enforcement and monitoring support and training continue to cause economic displacement.</p> <p>Project does not take into account the likely increased dependency on the park over time due to population growth and effects of climate change (unless radial shift in both in the regional economy and the rate and quality of service delivery by government – unlikely).</p> <p>Conflict caused from Public Participation Processes</p>	<p>Development of an <b>Interim Process Framework</b>. Over and above management measures included in <b>Principles, 1, 2, 3 and 10</b>, a targeted beneficiation strategy is developed to include:</p> <ol style="list-style-type: none"> <li>1) Focused stakeholder engagement with fishers and support for co-operatives (incorporated into the Oceans 5, Small-Scale Fishers project) (<i>Activity 1.5.1</i>)</li> <li>2) Alignment with IWPA’s Beneficiation Strategy which is actively seeking to grow the financial and non-financial benefits streams from the protected area to local communities to enhance efforts to generate independent, sustainable (post-project) livelihood interventions e.g. supporting access to tourism markets (<i>Activities 5.1.1 – 5.1.5</i>)</li> <li>3) Ensure our Livelihoods interventions do not over-utilise restricted natural resources (this will be incorporated into briefing of Livelihood partners) and in consultation with park ecologists.</li> <li>4) Ensure IMPs and MP accounts for CC and population growth effect on livelihoods and natural</li> </ol>	<ol style="list-style-type: none"> <li>1) Trial measure with strong organisational expertise.</li> <li>2) Trial measure</li> <li>3) ✓</li> <li>4) ✓</li> <li>5) Trial measure.</li> </ol>	<ol style="list-style-type: none"> <li>1) Community level</li> <li>2) MPA level</li> <li>3) MPA level</li> <li>4) MPA level</li> <li>5) MPA and community level</li> </ol>	<ol style="list-style-type: none"> <li>1) Staff time and match funding from Oceans 5 and Iconique Ocean Lab</li> <li>2) Staff time and travel; budget allocations for activities 5.1.1 - 5.1.5)</li> <li>3) N/A</li> <li>4) Staff time and budget allocations for <i>Activities 1.1.1 – 2</i></li> <li>5) Staff time and travel, budget allocations for</li> </ol>	<ol style="list-style-type: none"> <li>1) Co-management Co-ordinator (WILDTRUST )</li> <li>2) Project Manager, WILDTRUST, IWPA.</li> <li>3) Project Team, WILDTRUST &amp; Park ecologists, IWPA &amp; EKZNW.</li> <li>4) Project Team, WILDTRUST and relevant partners.</li> <li>5) Project Team, WILDTRUST.</li> </ol>	<ol style="list-style-type: none"> <li>1) Year 1 – 3</li> <li>2) Inception Phase</li> <li>3) Throughout project lifecycle</li> <li>4) Aligned to MP and IMP processes.</li> <li>5) Prior to IMP &amp; MP PPP processes.</li> </ol>



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Social and environmental risks and potential impacts <sup>19</sup>	Management measures <sup>20</sup>	Feasibility, effectiveness and sustainability <sup>21</sup>	Location	Costs	Implementation responsibility	Schedule
(PPPs) linked to the EMPs and MP due to the associated access restrictions, and boundary demarcations.	resource dependency and facilitate the integration of changing climate and changing social pressures as risks / issues in relation to effective MPA management over time ( <i>Activities 1.1.1 – 2</i> )  5) Capacity building for communities and support for SE linked to EMP and MP PPPs ( <i>Activities 1.1.1 &amp; 1.1.2</i> )			<i>Activities 1.1.1 &amp; 1.1.2</i>		
<p><b>Principle 6:</b> Gender equity and vulnerable groups (all of the WB ESF)</p> <p>Unequal benefit sharing among men and women, causing psychological stress or conflict.</p> <p>Women not being included in decision making around the MPA.</p> <p>Failure to make systemic changes in the approach to women’s inclusion in MPA decision making.</p> <p>People 35 years and older feeling marginalised due to being excluded from YES youth jobs.</p>	1) Development of a <b>Gender Action Plan</b> to address the complex gender dynamics in this region ( <i>Activity 5.6.1</i> ).  2) Activities focused on skills development and empowerment of women, to support their ability to engage in leadership platforms, and contribute to decision making ( <i>Activities 1.8.1, 5.6.1 – 5.6.6</i> )  3) Development of inclusive community engagement principles and participatory recommendations for women’s engagement in MPA decision making and gender disaggregated monitoring and evaluation ( <i>Activity 1.1.2</i> )  4) Women-focused media publications to demonstrate female leadership in the marine space ( <i>Activities 6.2.1 – 6.2.4</i> )  5) Linked to the beneficiation stakeholder process indicated in <b>Principle 2</b> , include a co-created	1) √ 2) √ 3) √ 4) √ 5) Trial measure but strong foundations built. 6) √	1) Project level 2) Community level 3) Community level 4) Project level 5) Project level 6) Community level	1) Staff time 2) Staff time and travel and budget allocations for <i>activities 1.8.1 and 5.6.1-5.6.6</i> ) 3) Staff time and budget allocations from <i>activity 1.1.2</i> . 4) Staff time and travel and budget allocations for <i>activities 6.2.1 – 6.2.4</i> )	1) ESMS Team, WILDTRUST 2) Project and ESMS team, WILDTRUST 3) ESMS team, WILDTRUST 4) Communications Team, WILDTRUST 5) Project and ESMS team, WILDTRUST 6) Project team, ESMS team, WILDTRUST	1) Prior to project inception & revised in Inception phase 2) Year 1 – 4 3) Inception phase 4) Year 1 – 4 5) Inception phase 6) Inception phase



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Social and environmental risks and potential impacts <sup>19</sup>	Management measures <sup>20</sup>	Feasibility, effectiveness and sustainability <sup>21</sup>	Location	Costs	Implementation responsibility	Schedule
<p>Failure to direct livelihood interventions to vulnerable groups and/or conflict caused by directed beneficitation towards vulnerable groups.</p> <p>Lack of inclusion of people with disabilities.</p>	<p>identification process for vulnerable households to received benefits (<i>Activity 5.1.1</i>).</p> <p>6) Map community committees and structures in each community in order to meaningfully engage with these structures, particularly those that represent the wellbeing and rights of vulnerable groups (including groups representing women and people with disabilities).</p>			<p>5) Budget allocations for <i>activity 5.1.1</i>.</p> <p>6) Staff time and travel.</p>		
<p><b>Principle 7:</b> Cultural Heritage (relates to WB ESS 8)</p> <p>Enforcement of access and use restrictions may impact cultural uses of the iSimangaliso Wetland Park and MPA, such as medicinal plant / product harvesting, collection of iNcema and iKhwane reeds for traditional mat and basket weaving, spiritual and religious ceremonies, and for recreation.</p>	<p>1) Adopt a cultural sensitivity approach, ensuring that cultural uses are recognised in protected area plan, management approaches and livelihoods interventions (<i>Activities 3.1.2, 3.2.3, 3.3.3, 5.1.5</i>).</p> <p>2) SSF component includes mapping and sharing of traditional knowledge and areas amongst fishers and managers to gain a 2-eye knowing approach (<i>Activity 1.5.1</i>)</p>	<p>1) √</p> <p>2) √</p>	<p>1) MPA level</p> <p>2) Community level</p>	<p>1) N/A</p> <p>2) N/A</p>	<p>1) Project team, WILDTRUST</p> <p>2) Project team and SSF Co-management co-ordinator, WILDTRUST</p>	<p>1) Throughout project lifecycle and particularly in early stages of relevant interventions</p> <p>2) Year 1</p>



**Table 9: Risk and impact management measures**

Social and environmental risks and potential impacts <sup>19</sup>	Management measures <sup>20</sup>	Feasibility, effectiveness and sustainability <sup>21</sup>	Location	Costs	Implementation responsibility	Schedule
<p><b>Principle 8:</b> Indigenous Peoples (relates to WB ESS 7)</p> <p>The project does not take into account the history of the Sub-Saharan African Historically Underserved Traditional Local Communities in the project area and acts without recognition of the economic and social marginalisation, including land dispossession and restricted/loss of access to their ancestral lands.</p>	<p>1) In line with the principles underpinning FPIC, the Project must ensure that it does not exacerbate local peoples' marginalisation including through specific SE activities detailed in <b>Principle 2</b>, and through activities aimed at inclusive approaches to MPA management and project implementation (Activities 1.1.1, 1.1.2, 1.1.3, 1.1.4, 1.4.1, 1.4.1, 1.5.1, 1.5.2, 2.1.2, 3.1.2, 3.2.3, 3.3.3, 4.1.2, 5.1.1, 5.1.4, 5.3.1, 5.5.1, 5.6.1, 7.2.3)</p>	<p>1) Various</p>	<p>1) MPA level</p>	<p>1) Relevant activity budgets.</p>	<p>1) ESMS team, Project team, IWPA and relevant partners.</p>	<p>1) Year 1 - 4</p>
<p><b>Principle 9:</b> Grievance Management (relates to WB ESS 10)</p> <p>Grievances arise.</p> <p>Existing unresolved grievances between stakeholders and the Park Authorities could threaten project outcomes, including grievances around access restrictions, boundaries of</p>	<p>1) Development of <b>Project Grievance Mechanism</b> safeguard (<i>Activity 1.8.1</i>) – <i>revision of existing Oceans Alive GM</i></p> <p>2) See <b>Principle 2</b>, point 1: Project to employ consultants to assist in addressing past grievances by enabling a structured, well facilitated process of airing the grievances and concerns between the two groups, with the intention of identifying the basis for reconciliation and cooperative working (<i>Activity 1.1.1</i>)</p>	<p>1) v</p> <p>2) Trial measure</p> <p>3) Trial Measure</p>	<p>1) Project level</p> <p>2) MPA level</p> <p>3) MPA Level</p>	<p>1) Staff time</p> <p>2) Staff time and budget allocations for activity 1.1.1)</p> <p>3) Staff time.</p>	<p>1) ESMS team, WILDTRUST</p> <p>2) Project team and ESMS team, WILDTRUST</p> <p>3) ESMS team, WILDTRUST &amp; IWPA</p>	<p>1) Prior to project inception.</p> <p>2) Year 1 – 4</p> <p>3) Year 3</p>



**Table 9: Risk and impact management measures**

Social and environmental risks and potential impacts <sup>19</sup>	Management measures <sup>20</sup>	Feasibility, effectiveness and sustainability <sup>21</sup>	Location	Costs	Implementation responsibility	Schedule
the park, law enforcement, land claims, and stakeholder engagement.	3) Development of an MPA-level Grievance Mechanism with IWPA (after the facilitated reconciliation process) ( <i>Activity 1.8.1</i> ).					
<p><b>Principle 10:</b> Human Rights (relates to BMZ guidelines on Human Rights)</p> <p>EKZNW SOPs not aligned to international standards.</p> <p>Risk to park officials in line of duty (physical harm) and risk to community members / poachers because of enforcement activities (especially if heavy handed).</p> <p>Risk of women being harassed by LE /other funded staff</p> <p>The project perpetuates possible/perceived human rights issues in relation to customary fishing rights.</p> <p>Risk to staff and park employees safety due</p>	<p>This principle is strongly underpinned by <i>Activities 1.1.1 and 1.1.2</i> – aimed at improving relations between the Park Authorities and communities inside surrounding the Park. We anticipate that this dialoguing process will include enforcement practices and the possibility of developing approaches that are accepted by all in relation to the broader and local benefits of the MPA. The Access Restrictions are also addressed in more detail in the <b>Process Framework</b>.</p> <p>1) Legal review and GAP analysis of SA law against international BAF-aligned standards and legal review and GAP analysis of EKZNW LE SOPs (<i>Activities 1.8.1. and 1.8.2</i>)</p> <p>2) Legal review (#1) and capacity building for marine /estuarine LE staff in human rights and conflict de-escalation (<i>Activities 1.8.1 and 1.3.3</i>)</p> <p>3) Gender Awareness &amp; GBV training for all funded staff including marine and estuarine LE officers and monitors. (<i>Activity 1.3.3</i>)</p> <p>4) Supporting the establishment of effective co-management / community stewardship structures that give local communities and other stakeholder</p>	<p>1) √</p> <p>2) √</p> <p>3) √</p> <p>4) Trial measure but with strong institutional experience.</p> <p>5) √</p> <p>6) √ (experienced consultants)</p>	<p>1) Project level</p> <p>2) Project level</p> <p>3) Project level</p> <p>4) Community / MPA level</p> <p>5) Project level</p> <p>6) MPA / Community level</p>	<p>1) Consultant fees, staff time, WILDTRUST, and budget allocations for <i>Activities 1.8.1. and 1.8.2</i></p> <p>2) Training costs (<i>Activity 1.3.3</i>).</p> <p>3) Training costs (<i>Activity 1.3.3</i>).</p> <p>4) Staff time and travel, budget allocations for <i>Activities 1.5.1, 1.5.2 and 1.1.4</i></p> <p>5) N/A</p>	<p>1) Consultant, Project team, WILDTRUST</p> <p>2) Consultant, Project team, WILDTRUST</p> <p>3) Consultant, Project team, WILDTRUST</p> <p>4) Project team, WILDTRUST</p> <p>5) HR team, WILDTRUST</p> <p>6) Consultant, Project team, WILDTRUST</p>	<p>1) Inception phase</p> <p>2) Inception phase</p> <p>3) Year 1</p> <p>4) Year 1 – 4</p> <p>5) Inception phase</p> <p>6) Inception phase</p>





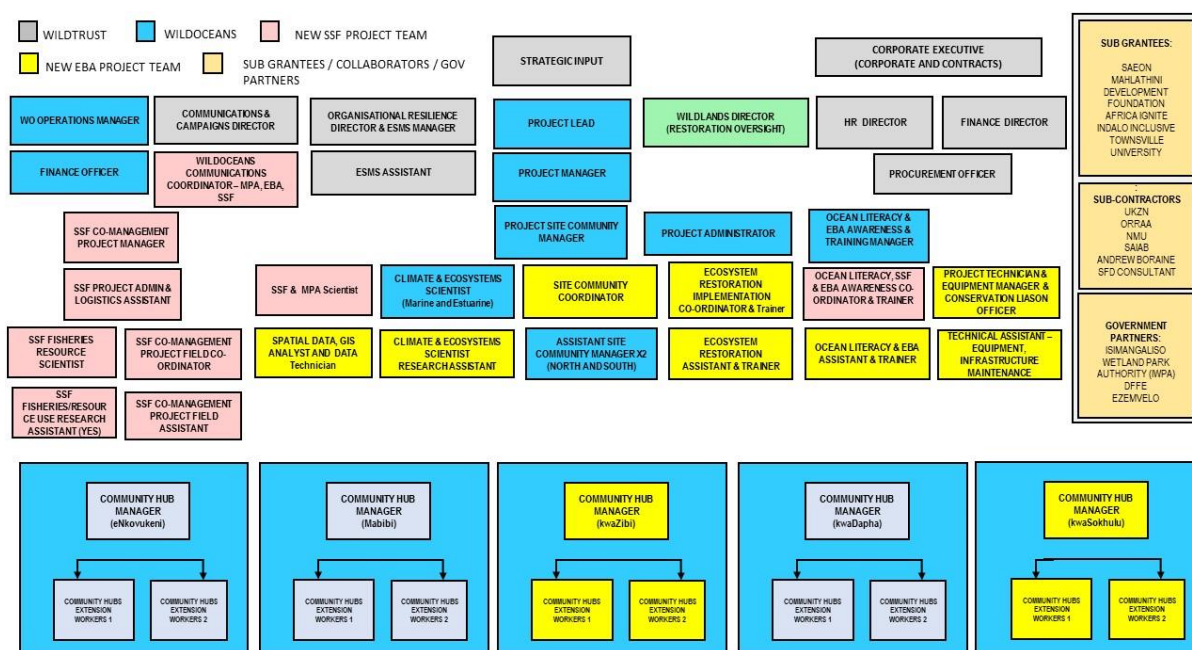
**Table 9: Risk and impact management measures**

Social and environmental risks and potential impacts <sup>19</sup>	Management measures <sup>20</sup>	Feasibility, effectiveness and sustainability <sup>21</sup>	Location	Costs	Implementation responsibility	Schedule
<p>poaching and crime syndicates in Northern KZN</p> <p>Access restrictions increased due to increased management and monitoring supported by the project causing economic displacement.</p>	<p>groups a voice in decision-making and planning and incentivises them to manage natural resources sustainably. Support for Small Scale Fisher Cooperatives (<i>Activities 1.5.1 &amp; 1.5.2</i>) and capacity building for community and fisher engagements in MP and EMP PPPs (<i>Activity 1.1.4</i>) and ensuring alignment with IWPA and DFFE's SSF strategies.</p> <p>5) Review of WT policies and procedures to account for crime and vehicle hijacking in Northern KZN and staff capacity building around hijacking and violent crime.</p> <p>6) Legal training for communities and fishers in preparation for MP and EMP PPPs (<i>Activity 1.1.4</i>). <i>Activities 1.1.4.1 – 2</i> (conducted in conjunction with activity 1.1.1)</p>			<p>6) Training costs (<i>Activity 1.1.4</i>)</p>		

## 5 ESMP Monitoring and Supervision

### 5.1 Organisational structure

WILDTRUST's organisational structure for the Project during implementation is presented in **Figure 5** below, including all implementing partners and collaborating partners. At this stage of project design and development, the organisational structure and organogram are still preliminary in nature. They will be updated and finalised during the first six months of project implementation. This section will continually be updated as changes to the organisational structure are made.



**Figure 5:** Organisational structure of the project

### 5.2 Roles and responsibilities

This section provides a general description of the environmental and social roles, responsibilities and functions of WILDTRUST staff members during the implementation of the Project.

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 direct responsibility for the implementation of all management measures and mitigation activities aimed at reducing the negative impacts of the project to acceptable levels and enhancing any positive impacts.

Furthermore, WILDTRUST 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 conducting public consultation activities necessary to support the implementation of any Safeguard Instruments and to disclose relevant project information<sup>22</sup> to different stakeholders.

<sup>22</sup> Refer to Blue Action Fund's ESMS Glossary of Terms for a description of Relevant Project Information.

Finally, WILDTRUST will work closely with the South African government and third-party organisations to initiate necessary capacity building and community development actions.

Responsibilities for stakeholder engagement include:

- Stakeholder analysis and engagement planning:
  - identification of the range of stakeholders that may be interested in the project and related activities (including the identification of the affected communities - where projects are likely to have adverse environmental and social effects on affected communities)
  - development and implementation of a comprehensive stakeholder engagement plan, paying particular attention to vulnerable groups and community representatives; and
  - preparation of a stakeholder engagement framework outlining general principles and a strategy to effective and meaningful engagement employed by the project team.
- Disclosure of information: Relevant project information will be disclosed to enable affected stakeholders to better understand the risks, impacts and opportunities of the project. This information could include:
  - the purpose, nature and scale of the project;
  - the duration of proposed project activities;
  - any risks to and the potential effects on such communities and relevant mitigation measures;
  - the envisaged stakeholder engagement process; and
  - the grievance mechanism.
- Effective informed consultation and participation engagements: When affected stakeholders are subject to identified risks and adverse impacts from a project, the project will undertake a process of consultation in a manner that provides the affected stakeholders with opportunities to express their views on project risks, impacts and mitigation measures, and allows the project to consider and respond to them. This could be consulted through the following process:
  1. The extent and degree of engagement required by the consultation process should be proportionate to the project's risks and adverse impacts, and the concerns raised by the affected stakeholders
  2. Effective consultation is a two-way process that should:
    - begin early in the process of identification of environmental and social risks and impacts, and continue as risks and impacts arise;
    - be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information that is in a culturally appropriate local language and format, and is understandable to affected communities;
    - focus inclusive engagement on those directly affected as opposed to those not directly affected;
    - be free of external manipulation, interference, coercion or intimidation;
    - involve a more in-depth exchange of views and information, and an organised and iterative consultation;
    - have the goal of incorporating into the project's decision-making process, the views of the affected stakeholders on matters that affect them directly, such as the proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues;
    - capture both men's and women's views, if necessary, through separate forums or engagements, and reflect men's and women's different concerns and priorities about impacts, mitigation mechanisms and benefits, where appropriate;
    - be documented, in particular the measures taken to avoid or minimise risks to, and adverse effects on, the affected communities; and
    - give information to those affected about how their concerns will be considered.
  3. Feedback to stakeholders on how their views and responses have been incorporated into the project design and how the identified risks/impacts will be mitigated and monitored throughout the project lifecycle.

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 the WILDTRUST's organisation, including senior management.

ESMS responsibilities in the WILDTRUST fall inside the Organisational Resilience Department, under the leadership of the Departmental Director. 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. The includes the Executive Director | WILDOCEANS, who is Project Lead for this project and Executive Director of Finance, HR and Compliance.

The ESMS Manger and her assistant will coordinate all ESMS requirements of the project, and implementation responsibility will be held jointly between the ESMS Manager and the Project Manager. Key support roles include the projects Stakeholder Engagement Manager and key staff at IWPA, including the Executive Manager: Socio-Economic Development and his team of regional Community Conservation Officers; Executive Manager: Conservation; and EKZNW, including the Park Ecologist, Regional Social Ecologist, and iSimangaliso MPA Park Manager.

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.

### 5.3 Training and awareness

WILDTRUST will develop a training, capacity building and awareness programme for all employees and contractors on how to implement the Blue Action Fund ESMS, project ESMP and other Safeguard Instruments appended to this ESMP. In addition, all new employees and contractors will attend a compulsory induction session that will include health and safety, environmental and community awareness, among other topics. Written and verbal communication methods will also be used to raise awareness on a range of occupational and community health, safety and security issues.

### 5.4 Monitoring, evaluation and reporting

To determine the effectiveness of the ESMP and to ensure that the management measures contained therein are being implemented, internal monitoring and evaluation exercises will be carried out. Evaluations will be carried out by WILDTRUST on an annual basis and will be based on the **Table 6** template. This table will be completed in conjunction with the project team, including staff from WILDTRUST and collaborating and implementing partners.

ESMS reporting will be done as part of the Annual Reporting. The Annual Report Template contains a section specifically for this purpose. For each management measure, it will be signalled whether implementation is on schedule (or ahead of schedule or completed), slightly delayed or delayed - using the suggested colour coding. Where delays are encountered, the reasons will be explained, and solutions suggested. Aside from progress, the effectiveness of the management measures will also be monitored and reported in **Table 9**. Annual monitoring will help identify any additional environmental or social risks that may have emerged since the Project started and help establish appropriate mitigation measures for any significant new risks. WILDTRUST will add these additional risks and their mitigating measures to the ESMP (**Tables 8 and 9**) and will report on them as part of future annual monitoring.

WILDTRUST will use observations and stakeholder consultations (in particular with PAPs) in order to judge the measures' effectiveness. They will also seek synergies with the Project's monitoring and

evaluation (M&E) plan which might include indicators that can be used for judging the effectiveness of management measures (e.g., livelihood indicators of PAPs).

## **5.5 Change management**

The ESMP will be routinely updated as the project progresses, including an annual review of progress and reporting to Blue Action Fund.

In the case of any unforeseen circumstances or planned changes to the scope, design, implementation or operation of the project that are likely to cause an adverse change in the environmental or social risks or impacts of the project, the ESMP will be put under immediate review. This can include in the case of changes in project partners, activities, scope and context.

The review and process will include the following steps:

- 1) ESMS coordinator reviews possible implications of the changes, including consulting with Project Affected People and any other relevant stakeholders if deemed necessary;
- 2) If deemed necessary, conduct additional E&S assessment(s) and stakeholder engagement and update on the risk management strategy above;
- 3) Update/ changes to any other relevant Safeguard Instruments associated with this ESMP;
- 4) Internal review and approval;
- 5) Submission to Blue Action Fund for approval;
- 6) Upon approval, disclose, implement and monitor the revised ESMP.

## References

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## **ANNEXES**

**Annexure A:** Stakeholder Engagement Plan

**Annexure B:** Grievance Mechanism

**Annexure C:** Process Framework

**Annexure D:** Gender Action Plan