



REPUBLIQUE TUNISIENNE



MINISTERE DE L'AGRICULTURE, DES RESSOURCES HYDRAULIQUES ET DE LA PECHE

INVESTMENT PROMOTION PROJECT FOR THE RESTORATION
AND DEVELOPMENT OF PRIVATE AGRO-SYLVO-PASTORAL
ECOSYSTEMS FINANCED BY THE FOREST INVESTMENT
PROGRAM (FIP - TUNISIA)

ENVIRONMENTAL AND SOCIAL MANAGEMENT
FRAMEWORK

EXECUTIVE SUMMARY

Prepared by the General Directorate of Forestry

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EXECUTIVE SUMMARY

1. Project description

1. Project objectives

The Investment Promotion Project for the restoration and valorization of private agro-sylvo-pastoral ecosystems was initiated following the selection of Tunisia by the Forest Investment Program (FIP) subcommittee as one of the pilot countries for the implementation of its second phase. The FIP is one of the three programs of the Strategic Climate Fund (SCF) within the framework of the Climate Investment Funds (CIF) of the multilateral development banks (MDBs). The FIP aims to support measures and mobilize funds to reduce deforestation and forest degradation and promote improved sustainable forest management, leading to emission reductions, protection of forest carbon stocks and the fight against poverty.

Placed under the supervision of the Minister of Agriculture, Hydraulic Resources and Fishing (MARHP), the project will be implemented in the governorates of Beja, Bizerte and Siliana with, as main beneficiaries, the private owners of degraded lands bordering the forests as well as the communities that will benefit from socio-economic impacts.

The project aims to promote forestry, arboriculture, and community agroforestry. It is based on the design and implementation of an innovative incentive financing mechanism to support investments in forestry, arboriculture and agroforestry plantations on degraded private lands.

The specific objectives are:

- improve carbon sequestration;
- Enhance protection of adjacent forest resources, soil and water;
- restore a sustainable public-private partnership in the forestry sector, and
- Increase the income of forest landowners and local populations in general as well as economic development in the project's target governorates.

2. Project components

Component 1: Establishment of a sustainable financing mechanism

The financing mechanism will be implemented on the basis of the organization, the support structure and the operating methods selected. Technical and institutional support would be provided to formalize the institutional anchoring and functioning of the funding structure. Operational procedures would be developed and validated. Capacity building actions will allow training of staff in the application of procedures to ensure proper functioning.

Component 2: Development of value chains of products from forests, trees and agro-forests

This component will support the valorization of products, the development of value chains of forestry and agro-forestry products for the emergence of small producers through the implementation of transformation units. It will aim to implement the investments planned in arboriculture/forest plantations and domestication of medicinal and aromatic plants or agro-forestry systems. These forestry investments (plantations for the production of wood or NTFPs) and activities related to the domestication of medicinal and aromatic plants (rosemary, myrtle, bourdaine, etc.) will be carried out on rural or pastoral plots threatened by erosion. These practices will also improve carbon sequestration (in biomass and soil), ensure the protection of soil and

water resources, and improve the income of landowners through increased productivity and diversification of their production.

Component 3: Management, Monitoring and Evaluation

This component will include the design and implementation of a monitoring mechanism (MRV type) including the accounting of GHG emissions and carbon sequestered by the Project compatible with the national forest and rangeland monitoring system.

2. Legal and institutional framework

1. Institutional framework

The institutional framework for environmental protection in the context of project implementation is characterized by a multiplicity of actors.

The main structures and institutions involved are as follows :

The Minister of Agriculture, Hydraulic Resources and Fishing (MARHP)

The MARHP is in charge of developing plans and strategies for the promotion of agriculture in terms of quality and quantity, deciding on the various development programs and projects within the framework of the national development plan and monitoring their implementation.

The General Directorate of Forestry (DGF)

The DGF's general mission is "to implement the measures of the Forestry Code and its implementing texts" (Article 7 of the Forestry Code). To do this, it relies on four (4) technical directorates at the central level and the forestry districts at the local level, which are part of the the Regional Commissariats for Agricultural Development (CRDA).

The Regional Commissariats for Agricultural Development (CRDA)

The CRDAs are public establishments of an administrative nature, with legal personality and financial autonomy. They are responsible, at the regional level (governorate), for all the missions carried out by the Ministry at the central level.

Forestry districts (ArF)

The forest districts are part of the CRDAs and are located at the governorate level. They are responsible for most of the management and control activities on the ground in the public and private forest estate of the State, as well as in the private forests and collective rangelands subject to the forestry regime.

Rural Women's Support Office (BAFR)

The BAFR is a department attached to the cabinet of the Minister of Agriculture, Hydraulic Resources and Fishing (MARHP). It provides support to the various agricultural structures and institutions of MARHP for the integration of rural women in the agricultural production sectors.

The National Agency for Environmental Protection (ANPE)

The ANPE is in charge of ensuring the application of regulatory texts relating to environmental protection, including those relating to environmental assessment, preparing the terms of reference necessary for the preparation of EIAs (for projects classified in Annex I) and specifications for projects classified in Annex II) and examining and ruling on EIA reports and specifications. The EIA Directorate of ANPE is responsible for the implementation, review and monitoring of the EIA. In addition to its central structures, ANPE has eight regional offices serving all the regions concerned by the project,

which check the specifications and their compliance with environmental requirements. They deliver the authorizations for the realization of the development works and right of use. These authorizations can only be granted after having noted and examined the EIA or the specifications, and issued a no-objection opinion on the development project. In case of non-compliance with the measures and recommendations of the EIA or the specifications, the authorization could be withdrawn.

The National Waste Management Agency (ANGED)

Created by Decree No. 2005-2317 of 22 August 2005, ANGED is a non-administrative public establishment under the supervision of the Ministry of the Environment. ANGED is responsible for participating in the development of national programs for waste management and managing public waste management systems.

2. Legal framework

The forestry code

The fact that Tunisia has had a Forestry Code since 1966 (revised in 1988) is an important advantage for forestry management. The Forestry Code covers three main areas: (i) enforcement of the forestry regime (including organization of forest users, disposition of forest products, and the regime of temporary occupancy and forest concessions), (ii) management of hunting and game conservation, and (iii) protection of nature, flora and fauna.

The Water Code

The Water Code, Law No. 76-75, promulgated on March 31, 1975, provides for measures to prevent the pollution of water resources and deals in part with marine waters. It was completed in 1985 by decree n°56 specifying the general conditions of discharge into the receiving environment. The water code was modified by the law n°2001-116 of November 26, 2001 by enriching the device of water mobilization based on the development of hydraulic resources, including the exploitation of non-conventional resources such as the desalination of brackish and salty waters and the waters of the seas and sebkhas.

Water and soil conservation

The Law n°95-70 of July 17, 1995 relating to the Conservation of Water and Soil (1995) applies to hills, mountain bases, slopes, glacis, wadi beds, watercourses and areas threatened by water erosion, wind erosion and silting. It aims to conserve land in these areas by restoring and protecting the soil from any kind of erosion, degradation and silting and protecting the structures and infrastructure from erosion, sedimentation and any other form of degradation. This law institutes the framework of intervention to protect the soil, based on the partnership between the administration and the beneficiaries.

Air pollution

The Law n°2007-34 of June 4 on air quality aims to prevent, limit and reduce air pollution and its negative impacts on human health and the environment as well as to set the procedures for air quality control, in order to make effective the citizen's right to a healthy environment and ensure sustainable development. The Decree No. 2010-2519 of September 28, 2010 sets the limit values at the source of air pollutants from fixed sources.

Waste management

The law n° 96-41 of June 10, 1996, relating to waste and the control of its management and elimination, defines the specific framework of the modes of management and elimination of waste as well as the

provisions relating to the prevention and the reduction of the production of waste at the source, the recovery, the recycling and the reuse of waste and the elimination of the ultimate waste in controlled dumps.

Management of pesticides

According to the Law n° 92-72 of August 3, 1992, on the revision of the legislation relating to the protection of plants (Title III: According to Law No. 92-72 of August 3, 1992, on the revision of the legislation on plant protection (Title III: Control of trade, distribution and use of pesticides), it is forbidden to manufacture, import, formulate, package, hold, transport, sell or distribute any pesticide product used to combat harmful organisms that has not been the subject of a registration or provisional authorization for sale issued by the Minister of Agriculture, following the opinion of a technical commission whose composition is determined by decision of the Minister of Agriculture.

Environmental Impact Assessments

Environmental Impact Assessments (EIA) are key tools for implementing the preventive axis of environmental policy and action to ensure the integration of the environmental dimension in the preparation cycle of investment projects. In this regard, Article 6 of Decree 2005-1991 clearly states that "one of the essential objectives of the EIA is to evaluate the foreseeable direct and indirect impacts [of activities subject to impact assessment] on the environment and in particular on natural resources. EIAs are carried out upstream of the design and preparation process for any economic development activity likely to have potential impacts on the environment and natural resources.

In addition, Decree No. 2005-1991 of July 11, 2005 - relating to the environmental impact assessment and setting the categories of units subject to the environmental impact assessment (EIA) and the categories of units subject to the specifications - makes the realization of projects conditional on a certificate of no objection from the ANPE. It specifies the provisions relating to the preparation, approval and monitoring of EIAs, the key players in the environmental assessment process and the projects subject to these procedures (Annexes I and II of the Decree).

The Heritage Code

Law 94-35 of 24 February 1994 on the protection of historical monuments and natural and urban sites. This Code defines archaeological, historical or traditional heritage and requires that, in the event of incidental discoveries of remains, the person making the discovery must immediately inform the competent services of the Ministry in charge of Heritage, which will take all necessary conservation measures and, if necessary, ensure the supervision of the work in progress (Art. 68). These services may, as a preventive measure, order that work in progress be stopped for a period not exceeding six months (Art. 69).

Protection of the workforce and working conditions

Law No. 94-28 of February 21, 1994, on compensation for damages resulting from work-related accidents and illnesses, establishes a list of work-related illnesses and the work and substances likely to cause them (toxic substances, hydrocarbons, plastics, dusts, infectious agents, etc.). It obliges the employer to declare the work processes likely to cause occupational diseases and the occupational doctor to declare the occupational disease found, specifying the nature of the harmful agent. Chapter VII of the Labour Code specifies the monitoring procedures and the sanitary police of work sites.

Child labor

In accordance with Tunisian legal provisions (see in particular the Labor Code in Articles 53-60 and Chapter XII relating to the employment of women and children in agriculture, the code of child

protection, Law No. 95-92 of November 9 relating to the publication of the code of child protection), the Project will ensure the elimination of any involvement of children under 16 years of age in the work and to protect child workers aged between 16 and 18 years.

Transportation of workers

Law No. 2004-33 of April 19, 2004, is intended to organize the land transport of people and goods and to set the rules and conditions for carrying out activities in this area. This legal framework has been completed by Law No. 2019-51 of June 11, 2019, which aims to put an end to the anarchic transport of agricultural workers that does not comply with safety measures and has been the cause of dramatic road accidents on multiple occasions.

Violence against gender

The "Organic Law No. 2017-58 of August 11, 2017 on the elimination of violence against women" aims to enable the recognition of violence and aggression targeting women and girls as specific violence and, as such, requiring specific treatment by the Tunisian public authorities.

AfDB Operational Safeguards Applicable to the Project

The main objectives of the SOs and the reasons why they were activated for the project are shown in the following table:

Sauvegardes Opérationnelles	Objectifs	Raisons/facteurs de déclenchement
Operational Safeguard 1 Environmental and social assessment	This overarching safeguard governs the process of determining a project's environmental and social category and the resulting environmental and social assessment requirements.	The Project is a Category 2 project, its planned activities are likely to have adverse but limited and site-specific environmental or social impacts that can be reduced through the application of appropriate management and mitigation measures or the incorporation of internationally recognized criteria.
Operational Safeguard 2 Involuntary resettlement land acquisition, population displacement and compensation	This safeguard consolidates the policy commitments and requirements set out in the Bank's policy on involuntary resettlement, and incorporates a number of refinements designed to improve the operational effectiveness of those requirements.	No physical resettlement is expected to occur as a result of the Project. However, project activities potentially present a risk of trampling of private land and restrictions on access to resources for local populations, particularly during the rehabilitation of rural roads.
Operational Safeguard 3 Biodiversity and ecosystem services	This safeguard aims to conserve biological diversity and promote the sustainable use of natural resources. It also translates the commitments in the Bank's policy on integrated water resources management into operational requirements.	The natural resources bordering the Project's intervention zones, which are forests, have a high ecosystem value. The consequences could be significant in the event of accidental pollution or major destruction of natural resources. Therefore, special attention must be given to measures to limit the impact on these resources.

Sauvegardes Opérationnelles	Objectifs	Raisons/facteurs de déclenchement
Operational Safeguard 4 Pollution prevention and control, hazardous materials and resource efficiency	This safeguard covers the range of key impacts of pollution, waste, and hazardous materials for which there are agreed international conventions, as well as comprehensive industry-specific and regional standards, including greenhouse gas accounting, that other multilateral development banks follow.	The project activities potentially present sources of pollution (dust, GHG, smoke, noise, effluents, waste, etc.), particularly during the construction and operation phases. Therefore, measures will be proposed for the management of these different sources of environmental impacts.
Operational Safeguard 5 Labour conditions, health and safety	This safeguard establishes the Bank's requirements for its borrowers or clients concerning workers' conditions, rights and protection from abuse or exploitation. It also ensures greater harmonisation with most other multilateral development banks.	The project activities will involve the use of a workforce that will need to be protected. All measures will be taken to ensure Health and Safety in the workplace (including transportation of workers) by providing healthy and safe working conditions.

SOs also require compliance with internationally accepted standards, in particular the IFC Environmental, Health and Safety Guidelines (EHS Guidelines¹). The EHS Guidelines are technical reference documents with examples of general and sector-specific international industry best practice. The General EHS Guidelines are as follows:

1. Environmental: 1.1 Air Emissions and Ambient Air Quality 1.2 Energy Conservation 1.3 Wastewater and Ambient Water Quality 1.4 Water Conservation 1.5 Hazardous Materials Management 1.6 Waste Management 1.7 Noise 1.8 Contaminated Land;
2. Occupational Health and Safety: 2.1 General Facility Design and Operation 2.2 Communication and Training 2.3 Physical Hazards 2.4 Chemical Hazards 2.5 Biological Hazards 2.6 Radiological Hazards 2.7 Personal Protective Equipment (PPE) 2.8 Special Hazard Environments 2.9 Monitoring;
3. Community Health and Safety 3.1 Water Quality and Availability 3.2 Structural Safety of Project Infrastructure 3.3 Life and Fire Safety (L&FS) 3.4 Traffic Safety 3.5 Transport of Hazardous Materials 3.6 Disease Prevention 3.7 Emergency Preparedness and Response;
4. Construction and Decommissioning 4.1 Environment 4.2 Occupational Health & Safety 4.3 Community Health & Safety.

3. Environmental and social issues

Several environmental and social issues are to be considered in the preparation and implementation of the Project, including

- Tunisia's forest and pastoral areas are a source of life for 8% of the country's total population, most of whom are poor and depend on agro-sylvo-pastoral activities. The various forest

¹ Link to EHS Guidelines:

https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

products contribute to 30 to 40% of the income of rural households;

- The Tunisian forestry sector is characterized by a complex land situation related to the imprecision of boundaries, the destruction or displacement of cadastral markers, illegal occupations of the State forestry domain (DFE), the lack of means of coordination and monitoring of the Administration, as well as the slowness and heaviness of procedures and land formalities, which lead to a delay in the operations of complementary boundary markers, land clearance or legal proceedings of land offenses;
- Despite the increase in forest cover, the state of degradation of forests and rangelands and the poverty of rural populations today show the limits of the approach adopted for their management. This situation is worse in less developed areas such as the north of the country where, in addition to poverty, capture by the elites is common;
- Difficulties in evacuating and commercializing certain agro-forestry products from isolated areas due to the deterioration of rural roads;
- Difficulties in accessing drinking water for rural populations;
- The need to develop human capital, particularly young people and women, through training, awareness and information adapted to arboriculture and agroforestry through the application of sustainable management of resources;
- The protection and preservation of forest and pastoral resources can only be guaranteed with the participation of local populations and through economic development that will improve their living conditions.

4. Environmental and social risks and impacts

According to the preliminary analysis of the activities of the three project components, the likely negative environmental and social impacts are few, site-specific, largely reversible, and easily minimized through the application of appropriate management and mitigation measures. This analysis also reveals the existence of significant positive social impacts in very disadvantaged rural forest areas affected by the project. According to the AfDB's ISS, the project is a Category 2 project.

a. Positive E&S impacts

The positive environmental and social impacts that can be generated by this project are summarized as follows:

- Consolidation of forest and pasture resource capital and restoration of vegetation cover;
- Adaptation to climate change and improvement of carbon sequestration;
- Valuation of private agro-sylvo-pastoral ecosystems and improvement of soil fertility and regeneration;
- Restoration of habitats by promoting the regeneration and development of fauna and flora;
- Protection of the forest against fires;
- Protection of the soil by preventing and minimizing erosion;
- Preservation of the quality and availability of water resources;
- Improvement of forestry, arboriculture and agro-forestry practices and production;
- Improved development of competitive agri-businesses, agri-food products and agri-pastoral

services;

- Reduction of poverty, regional disparities and local unemployment,
- Creation of employment, increase in people's income and improvement of livelihoods;
- Reduction of gender and social inequalities and regional disparities and mitigation of the vulnerabilities of large segments of the local population;
- Improved practices and management of agro-sylvo-pastoral activities through capacity building of national, regional and local stakeholders;
- Development of infrastructure, in particular by improving the practicability of rural roads to be rehabilitated.

b. Negative E&S risks/impacts

The main potential negative environmental and social impacts and risks are:

- Capture of project activities and/or benefits by elites;
- Risk of land conflicts between local populations and beneficiaries;
- Loss of vegetation cover (through tree felling and shrub cutting) and natural habitats during infrastructure rehabilitation and construction work;
- Air pollution by dust particles due to rehabilitation/construction work (excavation work, storage of construction materials and spoil, traffic of construction machinery, etc.);
- Erosion, landslides, subsidence in the areas of earthworks, excavation and extraction of borrow materials (quarries);
- Soil pollution by accidental spillage of hydrocarbons (oils, fuels) related to the use of vehicles and machinery on site;
- Ecosystem disturbance and alteration of water and soil resources due to the inappropriate use of fertilizers and chemical pesticides;
- Poor management of waste, especially waste from construction activities, settlement and processing of agro-forestry products;
- Accidents related to vehicle and machine traffic, particularly during the transport of agricultural workers (use of anarchic means of transport);
- Accidents for workers on construction sites due to non-compliance with safety standards;
- Gender-based violence, sexual exploitation and abuse, sexual harassment (GBV/SAH) against workers or project beneficiaries.

5. Environmental and Social Management Framework Plan

1. Environmental and social management process of sub-projects

The environmental and social management process for the sub-projects that will be adopted will take into account both the national regulatory provisions and the AfDB's SO 1. The key steps of the process are:

Step 1: Identification of activities to be undertaken

This step consists of identifying and locating the sites and main activities of the sub-projects on the basis of the establishment of a Project Fiche (FP).

Step 2: Selection and environmental and social classification of sub-projects

All sub-projects will be screened to determine the extent of their potential environmental and social risks and to decide on the required E&S safeguard instruments. As the project is classified as Category 2, no "High Risk" / "Category 1" sub-projects will be eligible.

Step 3: Preparation of required environmental and social safeguard instruments

This step involves the development of the instrument's terms of reference, the development of the instrument by an accredited consultant, and its submission to the UGO for technical review and validation.

Step 4: Integration of environmental and social requirements into the bidding documents and the pre-project implementation arrangements

The UGO will ensure that the requirements and recommendations of the various environmental and social assessments are integrated into the tender documents (DAO) and other relevant documents for sub-project implementation, including contracts with beneficiaries.

Step 5: Implementation of environmental and social measures

For each sub-project, the contracting companies and beneficiaries will be responsible for implementing the agreed environmental and social measures.

Step 6: Environmental and social monitoring and follow-up

The monitoring and follow-up activities of the implementation of the environmental and social safeguard instruments will be supervised by the UGO.

2. Institutional arrangement for the execution of the E&S management process of the sub-projects

Various actors will intervene in implementing ESMF measures. The table below defines actors with their main intervention tasks and levels.

Activities	Responsible	Support/ Collaboration	Provider
Establishment of a Project Fiche (FP)	UGO	CRDA E&S Focal Point	Regional E&S focal point
Environmental selection (Screening-filling of forms) on project sites	UGO	E&S Consultants	Regional E&S focal point E&S Focal Point
Approval of sub-project categorization	UGO	E&S Focal Point	E&S Consultants
Preparation, approval, and publication of Terms Of Reference ;	UGO	E&S Focal Point	E&S Consultants

Activities	Responsible	Support/ Collaboration	Provider
recruitment of consultant for the instrument elaboration			
Conduct of studies including consultation of the public and people affected by the sub-project	UGO	Regional and national institutions involved Local NGOs, Representatives of local communities.	Recruited consultants
Publication of the E&S instrument	UGO	MARHP	MARHP
(i) Integration in the Sub-project's bidding document of all environmental, and social measures of the work phase that can be contracted with the private company/operator ; (ii) approval of specific work documents (ESMP-C)	UGO	Point focal E&S	E&S Consultants
(i) Mobilization and communication with women's associations and women's community organizations; (ii) Implementation of specific GBV measures in the project's Grievances Mechanism (GM)	UGO	BAFR	E&S Consultants Point focal VBG
(i) Internal monitoring and follow-up of the implementation of environmental and social measures during works ; (ii) Transmission of supervision-monitoring reports	UGO	CRDA Regional institutions involved	Point focal E&S Point focal E&S régional E&S Consultants Control offices

3. Main indicators for implementing ESMF

As part of monitoring ESMF implementation, many indicators classified into three (3) categories (Managerial Performance Indicators, Environmental Condition Indicators and Social Condition Indicators) were defined.

The main indicators are:

- Annual number of E&S safeguard documents (ESIA/ESMP/ESIF) completed compared to the number of annual sub-projects classified as "Moderate Risk;
- Number of field inspections carried out (site visits);
- Number of training sessions conducted;
- Total number of complaints;
- Number of local workers by gender used;
- Percentage of women hired per sub-project.

6. Grievance mechanism

The proposed GM will be based on the following guiding principles: (i) Safety; (ii) Accessibility and contextualization; (iii) Predictability; (iv) Impartiality; (v) Fairness and (vi) Transparency.

The UGO will be responsible for the proper management, coordination, and follow-up of complaints related to the project. The GM follows the steps below:

- I. Receiving
- II. Evaluate and assign
- III. acknowledge receipt
- IV. Investigate
- V. Respond
- VI. Resolve
- VII. Appeal
- VIII. Follow up and Closure

7. Stakeholder consultation and participation

1. Previous stakeholder engagement activities

The consultations with stakeholders as part of the development of the ESMF were extended to the three (3) governorates of the project area, namely, the governorates of Beja, Bizerte and Siliana. They took place from 26 to 28 October 2022 at the headquarters of CRDA and involved all categories of stakeholders identified.

Overall, the exchanges and discussions were very informative and confirmed a strong motivation from the consulted stakeholders to see the project carried out in order to improve the agroforestry sector in their regions as well as to improve the socio-economic conditions of all the actors. They are very much in favor of the project and have expressed their strong support for its implementation.

2. Stakeholder Engagement and Communication Plan

A list of project-affected parties and other interested parties has been developed with particular

attention to disadvantaged or vulnerable groups.

The consultation process must be carried out in a way that is adapted to the target stakeholder. Therefore, a consultation process, by stakeholder categories and by associated consultation methods, was established for the entire life cycle of the project.

The main themes of consultation and communication planned are the following:

- Definition of the Project's objectives, scope and directions; Definition of key technical and operational components and elements of the project;
- Environmental & Social Issues; Environmental & Social Impacts of the Project;
- Design of the Grievances Mechanism (GM);
- Environmental and social risks; Mitigation measures adopted by the Project;
- Implementation of the Grievance Mechanism (GM);
- Preparation of monitoring and implementation reports;
- Evaluations of Project Implementation.

8. Overall estimated budget for implementing ESMF

The budget for the implementation of the provisions and measures of the ESMF is estimated at 250,000 DT according to the following details:

Tasks	Activities	Period	Budget (MDT)
Management tools	Elaboration of safeguard instruments (ESMP, FIES, etc.) by accredited consultancies / individual consultants	Before preparing the tender documents	150
	Execution of monitoring assignments by approved individual consultants / consultancies	From the start of activities	25
	Conducting annual E&S audits	Annually / Throughout the project	25
Communication and stakeholder engagement	Workshops / Stakeholder meetings / Complaints mechanism / Brochures / Press releases	Throughout the project	25
Training and awareness	Training modules for relevant stakeholders involved in the implementation of the Project	From the start of activities	25
TOTAL ESTIMATED BUDGET:			250

9. Conclusion

By analyzing the project, as well as environmental and socio-economic contexts of intervention areas, and based on the effective implementation of provisions and measures provided for in this report, the project can be carried out while controlling its potential challenges and risks/impacts. Also, the application of measures planned in the Stakeholder Engagement and Communication Plan, the

Grievance Mechanism and the Pest Management Plan remains essential.