CARIBBEAN COMMUNITY CLIMATE CHANGE CENTRE

Building Resilience. Securing Our Future.

Climate Actions for Building Resilience in Coastal Communities (CABRIC) in the Caribbean EDA Facility

Annex 6 – Environmental and Social Management Framework (ESMF)

Prepared by E Co.

Last modified and updated by the Caribbean Community Climate Change Centre

Date: July 2026

This report has been prepared for The Caribbean Community Climate Change Centre (CCCCC) – as part of the work to finalise the Funding Proposal Package for submission to the Green Climate Fund (GCF) for an Enhanced Direct Access (EDA) Funding Proposal titled, 'Climate Actions for Building Resilience in Coastal Communities in the Caribbean (CABRIC Caribbean)'

Published by: E Co.

Team leader: Ellie La Trobe-Hogan, E Co. ellie@ecoltdgroup.com

Authors: Darko Annandale, Remus Bandacu, Hollie Moffett

Last edited: 02 September 2026

Status: **Final**

Disclaimer: This document is issued for the party which commissioned it and for specific purposes connected with the above-captioned project only. It should not be relied upon by any other party or used for any other purpose. We accept no responsibility for the consequences of this document being relied upon by any other party, or being used for any other purpose, or containing any error or omission which is due to an error or omission in data supplied to us by other parties. This document contains confidential information and proprietary intellectual property. It should not be shown to other parties without consent from us and from the party which commissioned it. The views expressed in this report are those of E Co. staff and associates and they are not necessarily those of the commissioning party of anyone else.

Content

Executive summary 4
1. Baseline description 7
1.1 Biophysical characteristics 7
1.2 Environmental characteristics and trends 8
1.3 Socioeconomic characteristics 9
1.4 Indigenous peoples and local communities 12
2. Policy, legal, and institutional framework 14
2.1 Legal framework for ESS 14
2.2 Institutional framework 14
2.3 Safeguards governance structure 15
3. Environmental and Social risks of the project 17
3.1 Methodology for impact assessment 17
3.2 Assessment of environmental and social risks 18
3.3 Risk assessment 19
4. Environmental and Social Risk Management Plans 36
4.1 Environmental and Social Management Framework (ESMF) 36
4.2 ESS Screening Forms and subproject specific Environmental and Social Management Plans (ESMPs) 36
4.3 Labor Management Procedure (LMP) 36
4.4 Stakeholder Engagement Plan (SEP) 38
4.5 Indigenous Peoples Plan 38
4.6 Grievance Redress Mechanism (GRM) 39
4.7 SEAH Prevention and Response Protocol 39
4.8 Biodiversity Impact Checklists – Biodiversity Management Plan (BMP) 39
4.9 Process Framework Outline 40
4.10 Chance Find Procedures & Cultural Heritage Management Plan (CHMP) 41
5. Environmental and Social Action Plan (ESAP) 42
6. Sexual Exploitation, Abuse, and Harassment (SEAH) Risk Assessment 47
6.1 Baseline context 47
7. Environmental and social screening and approval process 51
7.1 Purpose of the screening and approval process 51
7.2 Overview of roles and responsibilities in screening 51

7.3 Steps in the screening and approval process 51
7.4 Exclusion list 52
7.5 Required safeguards documentation 53
8. Stakeholder engagement 54
8.1 Stakeholder engagement process 54
9. Grievance Redress Mechanism (GRM) 56
9.1 Project-level Grievance Redress Mechanism 56
9.2 CCCCC's Grievance Redress Mechanism 59
9.3 Community-level Grievance Redress Mechanism 61
9.4 Management of Environmental and Social Issues 61
10. Monitoring and evaluation 62
10.1 Roles and responsibilities 62
10.2 Evaluation mechanisms 62
10.3 Reporting framework 62
11. Information disclosure 64
Appendix I: Biodiversity Impact Screening Checklist 65
Appendix II: Indicative Land Management Procedure 67
Appendix III: Chance Finds Procedure 69
Appendix IV: Environmental and Social Screening Tool 69
Appendix V: Draft recommended EMMP tool 72

Executive summary

Overview of the programme

The Climate Actions for Building Resilience in Coastal Communities in the Caribbean (CABRIC) programme is a transformative initiative aimed at enhancing climate adaptation and resilience in five Caribbean countries: The Bahamas, Belize, Grenada, Jamaica, and Saint Lucia. The project, supported by the Green Climate Fund (GCF) and coordinated by the Caribbean Community Climate Change Centre (CCCCC), focuses on community-based adaptation, nature-based solutions, ecosystem-based adaptation (EbA), and enhanced stakeholder engagement mechanisms.

CABRIC is implemented through a regional umbrella programme structure. The Caribbean Community Climate Change Centre (CCCCC), as Accredited Entity and Executing Entity, hosts the Project Management Unit (PMU), which provides overall coordination, fiduciary oversight, and environmental and social risk management supervision. Grant-making is decentralised to the Grant-Administrating Executing Entities (EEs): for The Bahamas Protected Areas Fund, Grenada Investment Development Corporation and Saint Lucia Development Bank, the Jamaica Social Investment Fund (JSIF) for Jamaica; and the Belize Fund for Belize. CANARI serves as a capacity-building Executing Entity, supporting civil society organisations (CSOs), community-based organisations (CBOs), and other local entities to design and implement high-quality, safeguards-compliant projects. This ESMF therefore sets out an umbrella approach that defines minimum environmental and social requirements for all EEs and grantees, while allowing alignment with their existing systems and national regulatory frameworks.

The CABRIC project is designed to achieve the following key outcomes:

- Strengthen climate adaptation measures in vulnerable coastal communities.
- Promote nature-based solutions to enhance ecosystem resilience.
- Support sustainable livelihoods through climate-smart interventions.
- Improve governance and policy frameworks for climate resilience.
- Enhance stakeholder engagement and capacity building at local and national levels.

Key project activities include:

- Restoration and conservation of critical coastal and marine ecosystems.
- Development of early warning systems and disaster preparedness measures.
- Capacity-building programs for local governments and community organizations.
- Establishment of sustainable financing mechanisms for climate adaptation.
- Implementation of gender-sensitive and socially inclusive adaptation strategies.

Applicable social and environmental policies and safeguards

The Environmental and Social Management Framework (ESMF) for CABRIC aligns with international environmental and social safeguard standards, including the GCF Environmental and Social Safeguards (ESS) framework and the CCCCC Environmental and Social Management System (ESMS). Additionally, it integrates national regulatory requirements from the five participating countries.

Key safeguards include:

- **Environmental Protection**: Measures to prevent and mitigate adverse impacts on ecosystems and biodiversity.
- **Social Inclusion**: Ensuring equitable participation of marginalized and vulnerable communities.
- **Gender Equity**: Promoting gender-responsive adaptation strategies.
- **Indigenous Peoples' Rights**: Respecting and integrating traditional knowledge and cultural heritage.
- **Stakeholder Engagement**: Strengthening participatory governance mechanisms.

Objective and scope of the ESMF

The ESMF provides a structured approach to managing the environmental and social risks associated with CABRIC. The key objectives of the ESMF include:

- Establishing a framework for identifying and mitigating environmental and social risks.
- Ensuring compliance with GCF, the CCCCC and national safeguard policies.
- Providing guidelines for monitoring, reporting, and adaptive management.

- Facilitating stakeholder engagement and community participation in decision-making.

The scope of the ESMF covers all project activities, from initial planning to implementation and evaluation, ensuring that climate adaptation interventions are sustainable and inclusive.

Significant findings

The environmental and social risk assessment conducted as part of the ESMF identified several key findings:

- **High climate vulnerability**: the five target countries face increasing threats from climate change, including rising sea levels, coastal erosion, and extreme weather events.
- **Ecosystem degradation**: critical coastal and marine ecosystems, including coral reefs and mangroves, are under significant pressure due to human activities and climate change.
- **Socio-economic disparities**: marginalized communities, including women and indigenous groups, are disproportionately affected by climate impacts.
- **Governance gaps**: while national climate policies exist, there are gaps in implementation and enforcement.

Key recommended actions

To address these challenges, the ESMF recommends a series of integrated actions designed to build resilience, safeguard ecosystems, and support sustainable development. Strengthening policy and institutional capacity is essential to ensure that national, provincial, and local government institutions are equipped to plan, implement, and monitor climate adaptation initiatives effectively. This includes updating relevant policies and regulatory frameworks to integrate climate resilience into development planning, providing targeted training for government staff, and fostering cross-sectoral coordination to deliver coherent and impactful adaptation responses.

In parallel, the ESMF emphasises the importance of implementing nature-based solutions (NbS) by prioritising the restoration, protection, and sustainable management of critical ecosystems such as forests, wetlands, mangroves, and watersheds. These ecosystems provide natural defences against climate hazards, support biodiversity, and deliver essential services for water security, food production, and disaster risk reduction. Investing in NbS offers a cost-effective and sustainable approach to reducing vulnerability and protecting livelihoods.

Ensuring meaningful community participation is another key priority. The ESMF calls for the active engagement of local communities, including vulnerable and marginalized groups, at every stage of project design, implementation, and monitoring. This will be achieved through inclusive consultation processes, culturally appropriate capacity-building programs, and the establishment of community-led governance structures. Empowering communities to identify their adaptation priorities and co-manage natural resources will enhance the sustainability, equity, and local ownership of adaptation measures.

To support the long-term sustainability of these efforts, the ESMF proposes the development of sustainable financing mechanisms. This involves designing innovative funding frameworks that can secure ongoing investment in climate adaptation, such as establishing dedicated climate adaptation funds, mobilizing private sector contributions, leveraging international climate finance, and creating incentives for community-based conservation and sustainable livelihoods.

Finally, the ESMF underscores the need to improve monitoring and reporting systems to ensure accountability and measure progress. Robust environmental and social monitoring mechanisms will be established to track project performance, safeguard compliance, and assess adaptation outcomes. These systems will incorporate clear indicators, regular data collection and analysis, participatory monitoring approaches, and transparent reporting. By generating reliable data and lessons learned, these systems will inform adaptive management and guide future policy and investment decisions, contributing to more resilient and climate-ready communities.

Residual risks and mitigation measures

Despite the comprehensive mitigation strategies outlined in the ESMF, several residual risks remain that may continue to affect the success and sustainability of project outcomes. One of the most significant challenges is the inherent uncertainty surrounding future climate change impacts. Even with well-designed adaptation measures in place, unpredictable climate variability, such as shifts in rainfall patterns, prolonged droughts, or the increased frequency and intensity of extreme weather events, may exceed anticipated scenarios. This uncertainty can undermine the effectiveness of planned interventions and make it difficult to ensure long-term resilience, requiring continuous adjustments and adaptive management approaches throughout the project lifecycle.

Institutional and capacity constraints present another persistent risk. Many national and local institutions tasked with implementing climate adaptation measures may face limitations in terms of technical expertise, human resources, and financial capacity. Weak institutional frameworks and insufficient coordination between government agencies can further slow decision-making processes and impede the timely execution of project activities. Without sustained investments in capacity-building, institutional strengthening, and resource mobilization, there is a risk that projects may fall short of their objectives or face significant implementation delays.

Engaging and maintaining the active participation of local communities also remains a complex and ongoing challenge. Achieving meaningful stakeholder involvement is not a one-time activity but requires continuous dialogue, trust-building, and capacity development to ensure that community members are informed, empowered, and able to contribute effectively to project planning and management. High levels of community engagement are crucial for the success of adaptation measures; however, competing livelihood demands, consultation fatigue, and socio-cultural dynamics may limit the depth and consistency of participation over time.

Additionally, there is the potential for social tensions or conflicts to emerge, particularly in areas where land tenure systems are unclear or contested, or where access to natural resources is a source of competition. Climate adaptation projects that involve changes in land use, resource allocation, or ecosystem management may inadvertently exacerbate existing disputes or create new grievances if not carefully managed. Ensuring that adaptation interventions are equitable, transparent, and sensitive to local power dynamics is essential to minimizing these risks and promoting social cohesion.

Together, these residual risks highlight the need for adaptive project management, robust grievance redress mechanisms, continuous stakeholder engagement, and flexible financing strategies that can respond to evolving challenges over time

To mitigate these risks, the ESMF emphasises adaptive management, continuous stakeholder engagement, and integration of climate science into project planning.

The CABRIC programme presents a significant opportunity to enhance climate resilience in the Caribbean through a combination of ecosystem-based adaptation, stakeholder-driven governance, and robust environmental and social safeguards. The ESMF provides a comprehensive framework to ensure that project activities are sustainable, inclusive, and aligned with international best practices. Through effective implementation and continuous monitoring, CABRIC aims to create lasting positive impacts for coastal communities in the region.

1. Baseline description

1.1 Biophysical characteristics

1.1.1 The Bahamas

The Bahamas experiences a tropical marine climate characterized by warm temperatures year-round, moderated by the surrounding Atlantic Ocean. Annual rainfall averages between 1,000 and 1,600 mm, with a distinct wet season from May to October. Due to its geographical location, The Bahamas is highly susceptible to hurricanes, which frequently impact the islands, causing coastal erosion and flooding.

The topography consists of low-lying limestone islands and extensive coastal plains. Karstic landscapes dominate the terrain, leading to the formation of sinkholes and caves. The geological foundation is primarily carbonate platforms, resulting in shallow, sandy, and calcareous soils with low organic matter content, making large-scale agriculture challenging. Water availability is a major concern, as The Bahamas has limited surface water resources. It relies on freshwater lenses and groundwater stored in porous limestone formations.

The country is rich in marine biodiversity, supporting coral reefs, seagrass beds, and mangrove ecosystems that serve as critical habitats for marine turtles, seabirds, and numerous fish species. However, environmental threats such as coastal erosion, coral bleaching, and saltwater intrusion endanger these delicate ecosystems, requiring robust conservation efforts.

1.1.2 Belize

Belize has a tropical climate with distinct wet and dry seasons. Rainfall varies significantly by region, ranging from 1,500 to 4,000 mm annually, with the wet season occurring from June to November. This variability influences agriculture, forestry, and water resource management. The country's topography transitions from coastal lowlands to interior karst hills and mountains, offering diverse landscapes. The geological structure is limestone-dominated, leading to the formation of caves, underground rivers, and nutrient-rich alluvial and clay soils in the interior, which support agricultural productivity.

Belize is home to an extensive hydrological system, including major rivers such as the Belize River and New River, as well as large underground aquifers that sustain both urban and rural communities.

The biodiversity of Belize is exceptional, encompassing tropical rainforests, mangrove ecosystems, and the Belize Barrier Reef, the second-largest coral reef system in the world and a UNESCO World Heritage Site. However, human activities such as deforestation, coral reef degradation, and coastal development pose significant threats to its ecosystems, necessitating stronger conservation policies.

1.1.3 Grenada

Grenada has a tropical climate with an annual rainfall range of 1,500 to 3,800 mm, influenced by the trade winds. The island is prone to hurricanes, which can cause severe damage to infrastructure and natural habitats. As a volcanic island, Grenada's topography is rugged, with steep slopes and a mountainous interior. These volcanic formations result in fertile, well-drained soils in upland areas, which are favourable for agriculture, particularly the cultivation of spices such as nutmeg and cinnamon. The country has small but significant river systems that provide freshwater resources, with high groundwater availability due to the permeable volcanic rock formations.

Grenada supports a variety of ecosystems, including tropical forests, coastal mangroves, coral reefs, and seagrass beds. These ecosystems provide habitats for diverse species but face growing challenges due to deforestation, soil erosion, and the impacts of climate change, particularly on marine environments.

1.1.4 Jamaica

Jamaica's tropical maritime climate results in annual rainfall ranging from 800 to 5,000 mm, with precipitation patterns influenced by elevation. The island experiences both wet and dry seasons, with hurricanes and tropical storms posing periodic threats. The topography is defined by mountainous terrain, including the Blue Mountains, which reach over 2,200 meters in elevation. Coastal plains are found primarily in the south, while the interior is rugged and steep. Jamaica's geology consists of limestone and volcanic formations, with fertile alluvial soils in valleys that support agriculture.

The country has several major rivers, including the Black River and Rio Cobre, while aquifers provide crucial freshwater sources for urban and rural communities. The island is known for its rich biodiversity, featuring rainforests, dry forests, and coral reefs that sustain numerous endemic species. However, environmental concerns such as deforestation, watershed degradation, and coral reef decline pose significant challenges to sustainability.

1.1.5 Saint Lucia

St. Lucia experiences a tropical climate with a pronounced wet season, with annual rainfall levels ranging from 1,500 to 3,500 mm. The island is frequently impacted by hurricanes and tropical storms, which can lead to landslides and flooding. The topography of St. Lucia is mountainous, with deep valleys and volcanic peaks, including the famous Pitons, a UNESCO World Heritage Site. These volcanic formations contribute to the island's fertile soils, which are, however, prone to erosion due to steep slopes and deforestation.

St. Lucia has small river basins that contribute to high groundwater recharge potential, ensuring a steady freshwater supply despite the island's limited size. The island's ecosystems include rainforests, coastal mangroves, and coral reefs, which support a diverse range of species. Key environmental threats include land degradation, hurricane damage, and deforestation, necessitating integrated land and water management strategies.

1.2 Environmental characteristics and trends

While Section 1.1 describes the physical and ecological setting of the CABRIC countries, this subsection summarises the current environmental condition and trends in environmental risk, which together define the baseline against which CABRIC projects will be screened, categorised and managed.

Across all five countries, environmental risks are driven by the interaction of climate change, coastal development, ecosystem degradation and weak land-use control, creating highly sensitive operating environments for community-based adaptation investments.

These trends are particularly relevant for CABRIC because many EDA-financed projects will be implemented in already stressed coastal, watershed and reef systems, where cumulative and indirect impacts may be as important as direct project footprints.

1.2.1 The Bahamas

Environmental vulnerability in The Bahamas is driven by its low elevation, porous limestone geology and high coastal exposure. Sea-level rise and storm surge are already causing chronic saltwater intrusion into freshwater lenses, undermining potable water supply and agricultural viability on many islands. Hurricanes are increasing in intensity, leading to repeated cycles of coastal erosion, infrastructure damage and ecosystem disturbance.

Coral reefs and seagrass beds are under thermal stress, bleaching and physical damage from storms, while mangrove clearance for coastal development is reducing natural storm buffers. Urban growth around Nassau and Freeport has increased stormwater runoff, marine pollution and wetland loss, further weakening ecosystem resilience.

These trends mean that even small-scale coastal works, water harvesting, or drainage interventions can interact with fragile hydrological and reef systems, requiring careful screening for cumulative and downstream impacts.

1.2.2 Belize

Belize's environmental risk profile is shaped by the strong land–sea connection between upland catchments, rivers, mangroves and the Belize Barrier Reef. Deforestation, agricultural expansion and poorly managed roads and drainage have increased sediment and nutrient loads entering rivers and coastal waters, contributing to reef degradation, seagrass loss and declining fisheries productivity.

Mangroves are under pressure from tourism and coastal development, despite their critical role in shoreline stabilisation and storm surge protection. Climate change is amplifying these stresses through more intense rainfall, flooding and coral bleaching, increasing the vulnerability of both coastal ecosystems and dependent communities.
CABRIC projects in Belize must therefore be screened for hydrological, sediment and nutrient pathways, even where activities are located inland or appear small-scale.

1.2.3 Grenada

Grenada's steep volcanic terrain creates a high risk of soil erosion, landslides and sediment runoff during intense rainfall events. These processes directly affect coastal water quality, coral reefs and seagrass beds, which are essential for fisheries, tourism and shoreline protection.

Agricultural expansion on steep slopes and informal hillside development have increased land degradation and watershed instability, while hurricanes have repeatedly damaged forests and coastal ecosystems. Nearshore reefs are under pressure from sedimentation, warming seas and storm damage, reducing their capacity to buffer wave energy.

Projects involving slope stabilisation, drainage, water harvesting or coastal restoration must therefore be assessed in the context of catchment-scale erosion and sediment dynamics, not only site-level footprints.

1.2.4 Jamaica

Jamaica faces long-standing environmental pressures from deforestation, watershed degradation, mining, informal settlement and coastal development. River basins supplying Kingston, Montego Bay and agricultural areas are increasingly affected by erosion, pollution and altered flow regimes, leading to flooding in wet periods and water scarcity in dry periods.

Coastal ecosystems, including coral reefs, mangroves and beaches—are declining due to sediment loads, sewage discharge, tourism pressure and climate-driven bleaching. These trends increase exposure to storm surge, undermine fisheries and threaten tourism-dependent livelihoods.

Given this baseline, CABRIC projects in Jamaica must be screened for indirect impacts on watersheds, coastal water quality and ecosystem services, even when interventions are primarily social or livelihood-focused.

1.2.5 Saint Lucia

Saint Lucia's mountainous terrain, intense rainfall and coastal concentration of population create a high-risk profile for landslides, erosion, flash flooding and coastal instability. Deforestation and hillside agriculture have weakened watershed function, increasing sediment delivery to rivers and reefs.

Coral reefs and mangroves are under growing stress from warming seas, storms and coastal development, reducing their ability to protect shorelines and support fisheries. Water supply systems are increasingly vulnerable to climate variability and catchment degradation, particularly in dry seasons.

CABRIC activities in Saint Lucia therefore operate in a context of tight coupling between upland land use, water security and coastal ecosystem health, which must be explicitly considered in screening and EMMP design.

1.3 Socioeconomic characteristics

The socio-economic conditions across the five target countries exhibit substantial variation due to historical legacies, political structures, economic diversification, and geographic vulnerabilities. This section provides a comprehensive analysis of key socio-economic indicators, including population demographics, economic drivers, labour markets, infrastructure resilience, and social service delivery, supported by relevant references.

Vulnerable Populations and Poverty Alleviation Trends in CABRIC Countries

Across the CABRIC programme countries, poverty and social vulnerability remain persistent despite relatively high human development indicators compared to other developing regions. Vulnerability is particularly concentrated among children and youth, who consistently experience poverty at rates higher than national averages, driven by household dependency ratios, limited access to quality education and health services, and intergenerational deprivation (World Bank, 2023). Women, especially those heading households, also face disproportionate vulnerability due to structural gender inequalities in labour markets, wage gaps, higher informality, and limited access to productive assets and financial services (World Bank, 2023; UNDP, 2022). These gendered dynamics are further reinforced by caregiving burdens and lower participation in formal employment.

Rural and climate-dependent communities, including smallholder farmers, fishers, and natural resource-based livelihoods, represent another key vulnerable group within the CABRIC context. These populations are highly exposed to climate variability, extreme weather events, and ecosystem degradation, which directly affect income stability, food security, and resilience to shocks (UNDP, 2022). Low-income and informal workers are similarly vulnerable, as poverty in the Caribbean is strongly correlated with informality, precarious employment, and low educational attainment, with households headed by individuals with only primary education or less experiencing significantly higher poverty incidence (World Bank, 2023). Marginalised social groups, including ethnic minorities and Afro-descendant populations, often face overlapping disadvantages in access to services, land, and economic opportunities, reinforcing patterns of structural inequality across generations.

In terms of poverty alleviation trends, progress across the Caribbean has been uneven and in many cases fragile. While some countries have achieved moderate reductions in income poverty over recent decades, overall poverty rates remain significant and inequality remains high within most countries (ECLAC, 2022; World Bank, 2023). Child poverty continues to exceed adult poverty rates in many contexts, highlighting the persistence of intergenerational vulnerability (World Bank, 2023). Moreover, progress has slowed in several countries due to economic shocks, climate disasters, and the COVID-19 pandemic, which reversed gains in employment, household income, and food security (UNDP, 2022).

Poverty alleviation strategies across CABRIC countries increasingly rely on a combination of national social protection systems, community development programmes, and climate-resilient livelihood initiatives. Social investment funds and targeted cash transfer programmes play a central role in supporting vulnerable households, particularly where they are integrated with education, health, and community infrastructure investments (World Bank, 2023). However, data limitations and inconsistent poverty measurement across countries continue to constrain effective targeting and monitoring of poverty reduction outcomes (ECLAC, 2022). As a result, poverty reduction gains remain highly sensitive to external shocks, particularly climate-related disasters, underscoring the importance of integrated approaches that link economic empowerment, social inclusion, and climate resilience within the CABRIC programme framework.

1.3.1 The Bahamas

With an estimated population of approximately 400,000, The Bahamas is predominantly urban, with over 80% of its citizens residing in Nassau and Freeport (World Bank, 2022). The country faces an aging population trend, resulting in an increased demand for healthcare and pension services. The economy is heavily reliant on tourism, contributing nearly half of the GDP, with financial services making up an additional 15% (IMF, 2021). However, the country remains highly dependent on imports, particularly for food and energy, with the agricultural and manufacturing sectors playing only a minor role in domestic production.

Employment in The Bahamas is largely concentrated in the services sector, with approximately 80% of the labour force engaged in hospitality and financial services (ILO, 2022). Youth unemployment remains a challenge, exacerbated by a skills mismatch in emerging industries. Seasonal fluctuations in employment occur due to the cyclical nature of tourism. The country benefits from an advanced transport and communication network but remains highly vulnerable to hurricanes. Energy generation is heavily

reliant on imported fossil fuels, though renewable energy integration efforts are underway. Water security concerns persist due to limited freshwater sources and climate change impacts (Bahamas Water Authority, 2020).

Education levels remain high, with a literacy rate exceeding 95%, supported by strong primary and secondary education systems. The healthcare system is well-developed but remains susceptible to external shocks, including pandemics and economic downturns. Social inequality is growing, leading to disparities in housing and access to welfare services (WHO, 2021).

1.3.2 Belize

Belize has a population of approximately 430,000, characterized by significant ethnic diversity. The country's population growth rate remains high, with nearly half of its inhabitants under the age of 25 (Statistical Institute of Belize, 2021). Rural-to-urban migration is increasing, particularly toward Belize City. The economy is primarily driven by agriculture, including sugar, citrus, and seafood, alongside tourism and offshore financial services (Belize Central Bank, 2022). Due to its export-oriented nature, Belize remains vulnerable to fluctuations in global commodity prices and external market shocks. Fiscal sustainability remains a concern due to high levels of public debt.

Informal employment is prevalent, particularly in agriculture and tourism. Gender disparities exist in workforce participation, particularly in access to high-skilled jobs. The labour market is constrained by limited vocational training and higher education opportunities (ILO, 2022). Infrastructure development is ongoing, with improving road networks and rural electrification initiatives. The energy mix consists of hydroelectric power, which accounts for approximately 40%, with the remainder reliant on imported fossil fuels (Ministry of Energy, 2021). Water supply challenges are common in remote areas and are exacerbated by climate variability.

Access to education remains unequal, particularly between urban and rural areas, with Indigenous communities facing significant gaps. Healthcare services are improving, though they remain underdeveloped in interior regions. Crime and security issues continue to impact social stability and economic development (UNDP, 2021).

1.3.3 Grenada

Grenada has a population of approximately 113,000, with a largely rural distribution. Emigration has significantly influenced labour force availability and economic growth (World Bank, 2022). The economy is primarily reliant on tourism, which accounts for about 30% of GDP, alongside agriculture, particularly nutmeg and cocoa production (FAO, 2021). The small manufacturing sector provides limited industrial diversification. Climate-related economic shocks, including hurricanes and flooding, pose a significant risk to economic stability.

Employment in Grenada is largely dependent on tourism, while informal employment remains widespread in rural communities. Limited job opportunities for skilled labour have driven high levels of youth migration (ILO, 2022). Infrastructure development is ongoing, though the country's road and port infrastructure remains highly vulnerable to extreme weather events. Energy generation is primarily reliant on imported fossil fuels, with limited development of renewable energy sources. Housing in disaster-prone areas is often insufficient to withstand severe weather events (Grenada Disaster Management Agency, 2020).

Education access is widespread, but regional disparities exist in quality. The healthcare system is underfunded and constrained by limited financial and human resources. Disaster preparedness and climate adaptation efforts are essential for improving long-term resilience (UNDP, 2022).

1.3.4 Jamaica

Jamaica has a population of approximately 2.8 million, with high density in Kingston and Montego Bay (World Bank, 2021). Rapid rural-to-urban migration has strained urban infrastructure and services. The economy is driven by tourism, mining—specifically bauxite—and remittances, which contribute approximately 20% to GDP (IMF, 2021). The country faces a persistent trade imbalance due to its reliance on imports and is exposed to economic volatility resulting from global commodity price changes.

The informal sector plays a significant role in employment, particularly in agriculture and street vending. Unemployment remains high, and underemployment is a challenge, particularly for young people and women (ILO, 2022). Jamaica has a growing entrepreneurial ecosystem, though access to financing remains a barrier. Infrastructure is expanding, with investments in road

networks and renewable energy sources. Water scarcity and management challenges persist, especially in drought-prone areas. The housing sector faces shortages, and informal settlements continue to grow in urban areas (Jamaica Housing Authority, 2021). Jamaica has a strong higher education system, yet disparities in access remain, particularly in rural areas. The healthcare system is well-established but overburdened due to high population density. Crime and security concerns continue to impact economic productivity and foreign investment (UNDP, 2021).

1.3.5 Saint Lucia

St. Lucia, with a population of approximately 180,000, is experiencing increased urbanization and a growing aging population (World Bank, 2021). The economy is heavily centred on tourism, agriculture (primarily bananas), and light manufacturing. High external debt remains a challenge, while efforts at export diversification continue (IMF, 2021). Employment patterns are heavily influenced by seasonal tourism cycles, contributing to labour market instability (ILO, 2022). Infrastructure investments are ongoing, but water security remains a significant issue due to erratic rainfall patterns (FAO, 2021).

1.4 Indigenous peoples and local communities

CABRIC operates across territories of Indigenous Peoples with varying recognition status and traditional local communities, both the GCF Indigenous Peoples Policy (IPP)[1],the CCCCC Environmental and Social Management Framework (ESMF) and the CCCCC IP Policy are triggered. The CCCCC IP Policy in particular note that IPs are identified using internationally accepted criteria, such as self-identification and distinct cultural institutions, but explicitly notes that this operational engagement does not override national sovereignty or confer formal legal recognition. To navigate the region's diverse socio-legal realities, the policy maps the varying levels of recognition across Caribbean states—ranging from constitutional to no confirmed recognition—ensuring that Indigenous rights, territories, and governance systems are respected and protected during climate projects without infringing on the domestic legal frameworks of individual Member States.

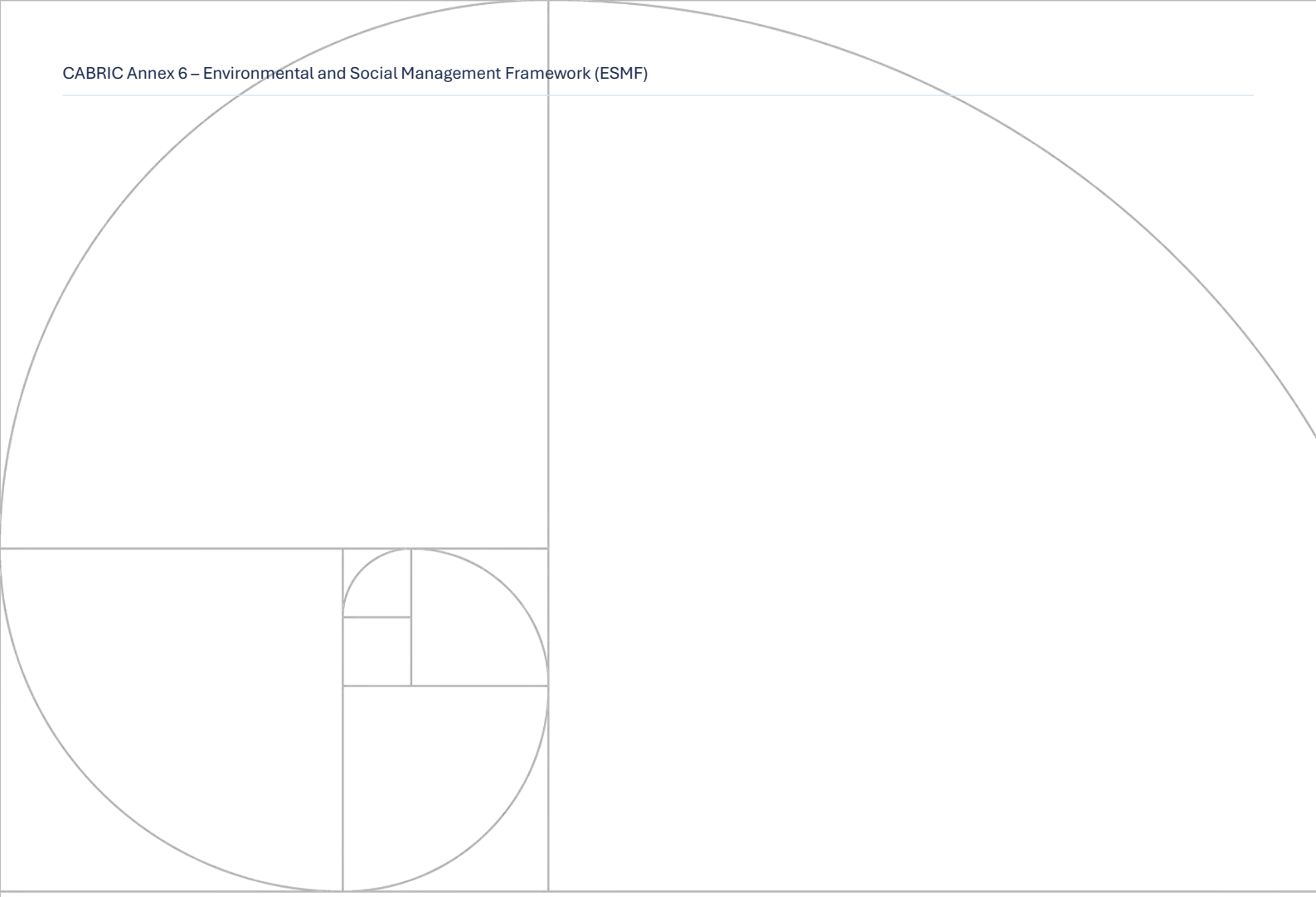
CABRIC will also partner with long-standing local communities that maintain deep cultural ties, locally rooted governance arrangements, and possess TK of coastal ecosystems that are essential to EbA. Their participation is supported through the project's SEP, GAP and ESMF, ensuring inclusive, culturally appropriate engagement and the integration of community governance and knowledge into design, implementation, and learning.

In line with international standards such as the UNDRIP and the GCF Indigenous Peoples Policy, this report adopts the following criteria for identifying Indigenous People. For this IPPF:

The term indigenous peoples is used in a generic sense to refer to a distinct social and cultural group possessing the following characteristics in varying degrees: (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 systems 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. This includes a language or dialect that has existed but does not exist now due to impacts that have made it difficult for a community or group to maintain a distinct language or dialect. The CABRIC Programme will take into account commonly accepted and applied criteria for identifying indigenous peoples, respecting self-identification as indigenous or tribal as a fundamental criterion for determining the application of this IPPF.

The ESMF and its accompanying IPPF will be applied to all Indigenous Peoples as identified under Section IV of the GCF Indigenous People Policy

[1] The GCF IP Policy also applies irrespective of the presence or absence of discernible economic, political or social vulnerabilities.



2. Policy, legal, and institutional framework

The programme operates within a multifaceted legal and institutional landscape that varies across the five target countries. Each country has distinct legislative frameworks and institutional mechanisms that govern environmental and social safeguards, ensuring compliance with international standards and national policies. This chapter provides an integrated review of the legal frameworks pertinent to ESS compliance and the key institutions responsible for enforcement and implementation at national, subnational, and local levels.

2.1 Legal framework for ESS

The legislative frameworks for environmental protection and resource management across the CABRIC project countries are designed to align with international commitments while addressing localized challenges. The Bahamas, for example, enforces environmental protection through the Environmental Protection (Control of Pollution) Act (2019) and the Bahamas National Wetland Policy (2007), which regulate pollution control and the sustainable management of critical ecosystems. Similarly, Belize's Environmental Protection Act (1992) and its Integrated Coastal Zone Management Plan (2016) establish guidelines for preserving coastal and marine environments while promoting sustainable economic activities.

In Grenada, the Environmental Management Act (2005) and the Integrated Coastal Zone Management Policy (2015) define the legal parameters for resource management and environmental sustainability. Jamaica, through its Natural Resources Conservation Authority Act (1991) and Beach Control Act (1956), ensures the protection of its diverse ecological landscapes. St. Lucia implements its Sustainable Development Act (2008) and National Water Policy (2015) to integrate environmental sustainability into national development strategies.

In addition to environmental laws, social inclusion and indigenous rights are key considerations within the CABRIC project countries. While The Bahamas, Belize, Jamaica, and St. Lucia have ratified the UN Declaration on the Rights of Indigenous Peoples (UNDRIP), none have adopted the legally binding ILO Indigenous and Tribal Peoples Convention No. 169. Nevertheless, Belize has made significant progress in recognizing indigenous land tenure through the landmark Maya Land Rights case (2015), establishing legal precedents for protecting traditional land use.

Gender equity and social inclusion are also integral to national policies, albeit with varying levels of enforcement across the five target countries. Jamaica has adopted relatively advanced gender-responsive policies, embedding gender considerations within climate finance and economic empowerment strategies. Belize and Grenada have integrated gender-sensitive approaches into broader sustainable development policies, though enforcement remains inconsistent. The Bahamas and St. Lucia have gender equity policies focusing primarily on economic participation, yet these policies do not fully incorporate gender-responsive environmental governance strategies.

Climate change legislation and disaster risk reduction frameworks are also fundamental components of the regulatory environment. Belize has developed a Climate Finance Strategy (2021–2026) to align financial mechanisms with national development objectives. Grenada's National Adaptation Plan (NAP) incorporates gender-sensitive approaches to climate finance, while Jamaica’s Climate Change Policy Framework (2015) promotes sector-wide adaptation measures. St. Lucia’s Climate Adaptation Financing Strategy supports policy alignment across different sectors, and The Bahamas is implementing National Climate Resilience Plans with integrated approaches for environmental sustainability.

2.2 Institutional framework

The implementation of the ESMF within the CABRIC project is embedded within a multi-tiered governance framework designed to ensure compliance, oversight, and operational efficiency. At the core of this structure is the Project Management Unit (PMU), housed within the Caribbean Community Climate Change Centre (CCCCC) as Accredited Entity (AE) and Executing Entity (EE). The PMU is responsible for overall programme coordination, fiduciary oversight, technical quality assurance, and supervision of environmental and social (E&S) risk management across all project components.

The Regional Programme Coordination Unit (RPCU)[2] is supported by the grant administrating Executing Entities (EEs): for The Bahamas Protected Areas Fund, Grenada Investment Development Corporation and Saint Lucia Development Bank,; the Jamaica Social Investment Fund (JSIF) for Jamaica; and the Belize Fund for Belize. Each EE operates within its own institutional mandates and systems but is required, under this ESMF and the CABRIC Operations Manual, to apply the agreed CABRIC environmental and social screening, categorisation and monitoring procedures, and to ensure alignment with national regulatory framework.

The PMU is supported by the Grant Administrating EEs. Each EE operates within its own institutional mandates and systems but is required, under this ESMF and the CABRIC Operations Manual, to apply the agreed CABRIC environmental and social screening, categorisation and monitoring procedures, and to ensure alignment with national regulatory frameworks. An ESS Specialist will conduct E&S screening of Expressions of Interest (EOIs) and full proposals using CABRIC tools; (ii) ensuring that mitigation measures and any Environmental and Social Management Plans (ESMPs) or Environmental and Mitigation Monitoring Plans (EMMPs) are integrated into grant agreements; (iii) overseeing compliance during implementation; and (iv) reporting E&S performance to the PMU on a periodic basis; (iv) mandate the designation of IP focal points to oversee IPPF implementation and monitor compliance.

To ensure grievances are handled in the most efficient and accessible manner, the CABRIC GRM operates on a two-tiered system. The primary point of contact for all project-related issues is the in-country is the Grant Administrators' CLO. The CCCCC's GRM serves as the second tier for appeals and for regional or sensitive complaints.

To ensure accountability and compliance with this ESMF and the CCCCC ESMS, the PMU will conduct periodic supervision missions and may engage independent Environmental and Social Compliance reviews or audits as required by the GCF and CCCCC policies. Findings from these missions and audits will inform corrective actions, updates to tools and procedures, and targeted capacity-building initiatives aimed at strengthening E&S implementation across all levels of governance.

At the national level, each participating country retains its own designated ministries and agencies responsible for the enforcement of environmental and social safeguards, including environmental permitting, EIA processes, land use planning, and labour and social protection.

Jamaica's National Environment and Planning Agency (NEPA) and its Climate Change Division serve as the main regulatory bodies for environmental sustainability, while St. Lucia's Department of Sustainable Development and National Climate Change Committee play similar roles.

At the subnational and local levels, implementation is supported through decentralized governance structures. In The Bahamas, the Local Government Act assigns district councils responsibilities for overseeing environmental governance. Belize's Coastal Zone Management Authority collabourates with municipal councils to implement environmental policies. Grenada's parish and municipal councils play a similar role in enforcing local regulations. In Jamaica, Local Sustainable Development Councils coordinate with parish councils to implement environmental initiatives, while St. Lucia's National Climate Change Adaptation Office provides technical support for local disaster preparedness efforts.

The institutional landscape is also shaped by regional and international frameworks that support collabourative efforts in environmental and social governance. The Caribbean Community Common Fisheries Policy (CARICOM Fisheries Policy) serves as a regional mechanism for sustainable fisheries management, encompassing The Bahamas, Belize, Grenada, Jamaica, and St. Lucia. The Caribbean Regional Fisheries Mechanism (CRFM) and the Strategic Action Program for the Sustainable Management of the Shared Living Marine Resources of the Caribbean and North Brazil Shelf Large Marine Ecosystems (CLME+ SAP) further reinforce transboundary cooperation in environmental sustainability and resource management.

2.3 Safeguards governance structure

The CABRIC programme implements a decentralised but harmonised safeguards governance structure to ensure consistent application of the ESMF across the five target countries. The structure clarifies risk management responsibilities and ensures strong supervision over community-level adaptation projects.

[2] Also known as the Programme Management Unit (PMU) in other annexes.

Regional Programme Coordination Unit (CCCCC)

The RPCU provides strategic oversight andquality assurance. Responsibilities include:

- Maintaining the ESMF and ensuring its application.
- Consolidating screening results from all Executing Entities.
- Maintaining the programme-wide E&S Risk Register.

Providing technical backstopping through the ESS expert.
Hosts the CABRIC Programme GRM, including SEAH reporting Pathways, and provide training and oversight to the Community Liaison Officers on matters relating to GRM.
Provides necessary information on CABRIC grievances to CCCCC Entity Level GRM.

- Conducting quality assurance reviews of screenings and mitigation measures.
- Escalating cases of non-compliance; recommending corrective actions.

Submitting consolidated reports to the Steering Committee and the GCF.
Overseeing programme-wide IPPF compliance and supporting the IP focal points

Grant administrators (JSIF, Belize Fund, The Bahamas Protected Areas Fund, Grenada Investment Development Corporation, Saint Lucia Development Bank)

EEs lead all project-level safeguards processes. Roles include:

- Screening EOIs and full proposals.
- Assigning risk categories.
- Ensuring ESMPs/EMMPs are prepared.

Monitoring safeguards implementation.
Operating Tier 1Publicizing the project's GRM and serving as a point of receipt of grievancesof thefor the GRM.

- Reporting on environmental and social performance to the RPCU.

National coordinators

The five national coordinators are contracted and hosted by the grant administrators' offices, but report operationally to CCCCC/the RPCU. They:

- Ensure alignment with national climate and environmental policies.
- Coordinate engagement across national institutions.
- Monitor contextual risks and report them to CCCCC.

CANARI (Capacity building EE)

Strengthens safeguards capacity of CSOs,community groups and Indigenous Peoples Organizations. CANARI will provide targeted, proactive technical assistance and training specifically tailored for IPOs to help them overcome barriers in project design, proposal writing, and compliance with the GCF Indigenous Peoples Policy (under Component 1).

- Provides training on the ESMF, EMMPs, GEDSI integration, and climate resilience.

3. Environmental and Social risks of the project

This section outlines the methodology for assessing the potential adverse environmental and social risk and impacts of the CABRIC Programme. The methodology follows a quantitative approach where possible, ensuring that impacts are systematically categorized and analysed. The framework reflects the project scope, participating countries, and activities introduced into the programme.

3.1 Methodology for impact assessment

The risk assessment remains structured around five key parameters:

TI = D + O + E + Du + R

Where:

TI = Total Impact Score

D = Disturbance (Minor to Major impact on the affected entity)

O = Occurrence (Probability of impact occurrence)

E = Extension (Geographic scale of impact)

Du = Duration (Temporal extent of impact)

R = Reversibility (Extent to which impact can be reversed)

The scoring matrix aligns with the project's geographical areas and activities.

3.1.1 Impact classification and risk categorisation

The risk classification methodology reflects the programme's activities

Impact Classification	Score
High Risk	$TI \geq 12$
Medium Risk	$10 \leq TI \leq 12$
Low Risk	$TI < 10$

3.1.2 Risk assessment approach

Risks identified in excess of a score of 10 will be highlighted, with further details provided on required mitigation measures.

Additional risk categories reflecting ecosystem services, transboundary impacts, and climate vulnerability have been incorporated.

The risk evaluation draws from a range of sources, including feasibility studies and climate vulnerability assessments.

3.1.3 Risk factors considered in the assessment

The assessment incorporates environmental, social, and operational factors relevant to the programme's scope. These factors include:

- **Operational Impacts:** Water, energy, and raw material consumption, waste management, hazardous material use, and infrastructure development.
- **Occupational Health & Safety:** Enhanced measures for remote and high-risk areas.

- **Community Impact:** Gender considerations, social inclusion, and potential displacement issues.
- **Climate and Environmental Impacts:** Greenhouse gas emissions, ecosystem degradation, and biodiversity impacts.

3.1.4 Future role of an Environmental Mitigation and Monitoring Plan (EMMP)

One possible consideration for CABRIC is that any funded activity is subject to an environmental and social risk screening and categorisation process, and, where relevant, an Environmental Mitigation and Monitoring Plan (EMMP) or equivalent instrument. In practice, the EEs will apply the CABRIC screening tools and categorise projects (e.g. No/Minimal Risk, Moderate Risk, Substantial Risk – with a GCF upper limit of Category B/medium/moderate risk for CABRIC), with technical support from the PMU where needed.

Projects that are screened as having moderate environmental or social risk will require an EMMP or ESMP, clearly setting out mitigation measures, responsibilities, indicators, monitoring arrangements and budget. Low or no-risk projects may proceed with standard good-practice measures embedded in implementation.

Activities carried out by EEs and their grantees can include a range of discrete projects under various awards that may generate site-specific environmental or social risks (typically at Category B or lower). The EMMP procedure will provide CCCCC and the EEs with a consistent framework for (i) screening and categorising projects; (ii) identifying mitigation measures; and (iii) monitoring and reporting on the implementation of those measures.

The EMMP should categorise pilot projects into three risk categories as follows:
Low Risk,
Moderate Risk, and

- High Risk

Only projects within the No adverse or Low risk and Moderate Risk (equivalent to GCF Category C and B) range will be eligible for CABRIC financing. High-risk projects (equivalent to GCF Category A) will not be financed

3.2 Assessment of environmental and social risks

3.2.1 Risk evaluation framework (Components 1 & 2)

The risk assessment includes project components and country-specific considerations. The matrix categorizes risks using a framework that accounts for transboundary concerns, cumulative impacts, and climate adaptation requirements.

Key Considerations in Risk Management:

- **Scope covering project sites and associated ecosystems.**
- **Risk scoring matrix** reflecting challenges associated with project activities.
- **Mitigation measures** tailored to each country's regulatory framework and environmental sensitivity.
- **Emphasis on climate resilience** and ecosystem-based approaches to mitigation.
- **Integration of activities**, such as community-led climate adaptation initiatives, CSO and NGO engagement in pipeline development, and knowledge exchange mechanisms.

Table 1 Score matrix utilised in analysing risk

Impact Classification			
Score	3	2	1
Disturbance (D)	Major	Regular	Minor
Occurrence (O)	Very probable	Probable	Not probable
Extension (E)	National	Local	Immediate
Duration (Du)	Permanent	Medium	Short
Reversibility (R)	Irreversible	Partial	Reversible
Total Impact (TI)			
High Risk[1]		TI ≤ 12	

Impact Classification	
Medium Risk[2]	10 ≤ TI ≤ 12
Low Risk[3]	TI < 10

Any risk that collectively scores in excess of 10 is highlighted Table 3 and the risk is copied to Table 4. The risks tabulated and presented under the above category titles have been collated from a number of documents produced for this programme; namely the following:

- Gender Assessment and Action Plan (GAAP);
- Stakeholder Engagement Plan (SEP);
- Grievance Redress Mechanism (GRM);
- Feasibility Study (FS).

Table 2 Risk factors considered when assessing the CABRIC programme, based on factors identified by the IFC (2015).

Operations	Occupational Health and Safety Impacts	Labour and Working Conditions	Community Impact
1. Raw materials consumption 2. Energy consumption 3. Water consumption 4. Wastewater quantity & quality 5. Air emissions 6. Solid waste generation 7. Hazardous waste generation 8. Usage of chemicals 9. Usage of hazardous materials 10. Noise generation 11. Land conversion	1. Fire and explosion 2. Physical hazards 3. Ergonomic hazards 4. Chemical hazards 5. Biohazards 6. Radiation hazards 7. Electrical hazards 8. Work zone air quality 9. Work zone noise 10. Eye hazards 11. Workplace temperature 12. Working at heights. 13. Working in confined spaces 14. Industrial vehicle driving and site traffic 15. Transportation of workers	1. Age of workforce 2. Gender of workforce 3. Presence of dormitories 4. Differences in nationalities/ ethnicities 5. Use of security guards 6. Use of migrant labour 7. Use of temporary, seasonal and contract labour, on- or off-site 8. Use of apprentice programs 9. Use of production-quota-based pay systems 10. Use of recruiting or labour contracting agencies 11. Presence of worker representatives	1. Contamination of surface water 2. Ambient air quality/odor from industrial emissions 3. Solid waste disposal 4. Hazardous waste disposal 5. Usage of hazardous materials 6. Ground or surface water depletion 7. High ambient noise level due to industrial operations 8. Ground water contamination 9. Air emissions, transport noise 10. Traffic congestion 11. Cultural heritage/historical/ ecologically sensitive sites Land acquisition and usage Ease of Access to Community Telecom and internet penetration within community, 12. Buildings and infrastructure development/ decommissioning 13. Security personnel

3.3 Risk assessment

Table 3 Assessment of environmental and social risks management (Components 1 & 2)

PS	Objectives	Description	D	O	E	Du	R	TI	Explanation *Mitigation*
PS1	Assessment and Management of Environmental and Social Risks and Impacts, including: Policy (or equivalent documents) Process for identifying risks and impacts Management programme Organisational capacity & competency External communications	1.1 Does the Project identify environmental and social risks?	1	1	1	1	1	5	This ESMF document has (as far as possible) identified risks and measures that must be taken to reduce risks throughout the proposed CABRIC project. *Environmental and Social Action plan addresses mitigation measures for significant risks scored over 10.*
		1.2 Does the Project adopt mitigation hierarchy: anticipate; avoid; minimize; compensate or offset?	1	1	2	1	1	6	A key focus of CABRIC is on climate adaptation measures, through this may embrace specific pilot projects that have a mitigative focus to some degree or other (including aspects of greenhouse gas avoidance by renewable energy integration).
		1.3 Does the Project plan to improve performance through an ESMS?	1	1	2	1	1	6	The project's ESMF provides initial guidance on ESMS. Further development of this EDA proposal will need to ensure this system is developed further and implemented within national systems for the five target countries.
		1.4 Is there a risk that duty-bearers do not have the capacity to meet their obligations in the Project?	3	1	3	2	1	10	National duty bearers (NDAs etc) are (in most countries) committed to the CABRIC programme and have requisite capacity to meet obligations. However, capacity on ESS risk management is somewhat lacking across the project's key institutional stakeholders. As such ESS management capacity shall be supported throughout project implementation at a country-level.
		1.5 Is there a likelihood that the Project would have inequitable or discriminatory adverse impacts on affected populations?	2	2	3	1	2	10	Efforts are needed to ensure that the screening tools in the Appendix of this ESMF are adhered to thus ensuring that Pilot Projects are designed to engage and include vulnerable populations and all stakeholders.
		1.6 Could the Project potentially restrict availability, quality of and access to resources or basic services, in	1	1	3	1	1	7	Pilot Projects shall be designed to ensure availability and quality access to basic environmental and ecosystem services

PS	Objectives	Description	D	O	E	Du	R	TI	Explanation *Mitigation*
		particular to marginalized individuals or groups?							provision for all five target countries and to all marginalized groups therein.
		1.7 Is there a likelihood that the Project would exclude any potentially affected stakeholders, in particular marginalized groups, from fully participating in decisions that may affect them?	1	1	3	1	2	8	This is very dependent upon which organizations apply for grant funding (Component 2) though each country shall be encouraged to ensure that applications are designed in such a way that stakeholders engaged throughout project and systems are in place to include in decision making.
		1.8 Is there a risk that rights-holders do not have the capacity to claim their rights?	1	1	2	1	1	6	National laws will be followed within each of the five target countries and as such any group or individual within the five countries should have capacity to claim their rights.
		1.9 Have local communities or individuals, given the opportunity, raised human rights concerns regarding the Project during the stakeholder engagement process and has this been included in the overall Project proposal and in the risk assessment?	2	1	3	1	3	10	Baseline survey work in the preparation of this ESMF was not robust enough to guarantee that all local environmental and social challenges were captured. The CABRIC *Full Proposal will be designed to integrate all stakeholder views as a means to determine interventions and locations for meaningful project implementation*.
		1.10 Is there a risk that the Project would exacerbate conflicts among and/or the risk of violence to project-affected communities and individuals?	1	1	1	1	1	5	Not a reported issue in this Programme. Low risk. As the likelihood of the project worsening conflicts or violence among project-affected communities and therefore will not be a reported issue for the programme, a conflict sensitivity assessment will not be required.
		1.11 Have women's groups/leaders raised gender equality concerns regarding the Project during the stakeholder engagement process and has this been included in the overall Project proposal and in the risk assessment?	1	2	2	1	2	8	Yes, the GAAP produced for this project addresses this fact (see Section 4.4 of this document).
PS2	Labour & Working Conditions Fair treatment, non-discrimination, equal opportunity	2.1 Does the Project involve support for employment or livelihoods that may fail to comply with national and international labour standards (i.e.	1	1	3	1	1	7	All employment associated with the project will comply with national labour standards within each of the five target countries and therefore ILO conventions.

PS	Objectives	Description	D	O	E	Du	R	TI	Explanation *Mitigation*
	Good worker–management relationship	principles and standards of ILO fundamental conventions)?							
	Comply with national employment and labour laws Protect workers, in particular those in vulnerable categories Promote safety and health Avoid use of forced labour or child labour	2.2 Is there a likelihood that the proposed Project would have adverse impacts on gender equality and/or the situation of women and girls?	1	2	3	3	2	11	Whilst there is a potential for adverse impacts to disproportionately affected women and marginalized groups in the proposed countries, the project has undergone a detailed assessment of gender specific risks (see project's GAAP). The GAAP has also informed the project design, which now includes strong gender component to address gender equality so impacts will be positive and not adverse.
		2.3 Would the Project potentially reproduce discriminations against women based on gender, especially regarding participation in design and implementation or access to opportunities and benefits?	1	2	3	3	2	11	The project has components with disparate representation of men and women with men being more prevalent in the jobs required for PV installation, mains replacement etc. and women being more prevalent in knowledge management, education and outreach. *The project will develop and implement a Gender and Infrastructure training component that would integrate women in design phases and address gender throughout all aspects of the project cycle.*
		2.4 Would the Project potentially limit women's ability to use, develop and protect natural resources, taking into account different roles and positions of women and men in accessing environmental goods and services?	1	1	3	1	1	7	The GAAP produced for this project addresses this fact (see Section 4.4 of this document). This addresses gender issues throughout project lifecycle and would expand women's ability to use, develop and protect coastal and water resources.
		2.5 Does the Project provide adequate training and resources for health and safety?	2	2	1	1	1	7	The level of training ultimately will depend on the nature of the EDA Pilot Projects awarded by CCCCC and whether CCCCC wishes to carry out staff training on this aspect or whether this is a nationally responsible task. With national approval, the CCCCC could train national project developers or help to move the project from concept to a project proposal; hence

PS	Objectives	Description	D	O	E	Du	R	TI	Explanation *Mitigation*
									mitigating conflict with activities that might fall outside its scope.
		2.6 Does the Project avoid the use of child labour?	1	1	2	1	1	6	The Component 2 grant applications will need to include reference to knowledge exchanges and trainings and application procedures which shall need to be put in place to ensure child labour is not violated during any grant funded project.
PS3	Resource Efficiency and Pollution Prevention Avoid, minimize or reduce project-related pollution More sustainable use of resources, including energy and water Reduced project-related greenhouse gas emissions	3.1 Would the Project potentially result in the release of pollutants to the environment due to routine or non-routine circumstances with the potential for adverse local, regional, and/or trans-boundary impacts?	2	2	1	1	3	9	Component 2 project concept screening tools (see Annex 3 of this ESMF) are recommended for adoption to ensure that this risk is mitigated for all potential applications. Project specific mitigation measures for pollutant release will need to be potentially set up as required.
		3.2 Would the Project potentially result in the generation of waste (hazardous and non- hazardous)?	1	3	3	1	1	9	Component 2 project concept screening tools (see Annex 3 of this ESMF) are recommended for adoption to ensure that this risk is mitigated for all potential applications. Project specific mitigation measures for waste will need to be potentially set up as required.
		3.3 Will the Project potentially involve the manufacture, trade, release, and/or use of hazardous chemicals and/or materials? Does the Project propose use of chemicals or materials subject to international bans or phase-outs?	1	1	1	1	1	5	Component 2 project concept screening tools (see Screening tools in the Appendix of this ESMF) are recommended for adoption to ensure that this risk is mitigated for all potential applications. Project specific mitigation measures for the use of hazardous chemicals or materials will need to be potentially set up as required; though this risk is highly unlikely to occur (being screened out of the application process).
		3.4 Will the Project involve the application of pesticides that may have a negative effect on the environment or human health?	1	1	1	1	1	5	Component 2 project concept screening tools (see Screening tools in the Appendix of this ESMF) are recommended for adoption to ensure that this risk is mitigated for all potential applications. Project specific mitigation measures for the use of pesticides

PS	Objectives	Description	D	O	E	Du	R	TI	Explanation *Mitigation*
									will need to be potentially set up as required; though this risk is highly unlikely to occur (being screened out of the application process).
		3.5 Does the Project include activities that require significant consumption of raw materials, energy, and/or water?	1	1	3	1	1	7	The project includes a key focus on water resource management though it is unlikely that use of water (consumption) will occur (being screened out of the application process).
		3.6 Does the Project include plans that would reduce greenhouse gas emissions?	1	1	3	1	1	7	Key focus of the EDA is on climate adaptation measures, though this may embrace specific pilot projects that have a mitigative focus to some degree or other; including as aspects of greenhouse gas avoidance by renewable energy integration.
		3.7 Does the Project include plans for sustainability training and certification for the project?	1	1	3	1	1	7	Component 1 of the Programme focuses directly on improving capacity and training needs. Training and certification programs are also encouraged in all Component 2 grant funded EDA applications which will lend to the overall sustainability of the project. With national approval, the CCCCC could train national project developers or help to move the project from concept to a project proposal; hence mitigating conflict with activities that might fall outside its scope.
PS4	Community Health, Safety and Security To anticipate and avoid adverse impacts on the health and safety of the affected community To safeguard personnel and property in accordance with relevant human rights principles *Risks relating to 4.1:* climate impacts disrupting planned engagement activities	4.1 Would elements of Project preparatory, operation, or decommissioning pose potential safety risks to local communities?	3	2	3	1	1	9	During preparatory phases of some Component 2 projects safety risk levels may be higher than usual depending upon the nature of the grant funded application. Mitigation efforts may include flexible scheduling, and rapid response mechanisms for climate emergencies to ensure communities are safely and accurately engaged.
		4.2 Would the Project pose potential risks to community health and safety	1	1	1	1	1	5	Component 2 project concept screening tools are recommended for adoption to ensure that

PS	Objectives	Description	D	O	E	Du	R	TI	Explanation *Mitigation*
		due to the transport, storage, and use and/or disposal of hazardous or dangerous materials (e.g. explosives, fuel and other chemicals during preparatory and operation)?							this risk is mitigated for all potential applications. Project specific mitigation measures for the use of hazardous chemicals or materials will need to be potentially set up as required; though this risk is highly unlikely to occur (being screened out of the application process).
		4.3 Does the Project involve large-scale infrastructure development (e.g. dams, roads, buildings)? Would failure of structural elements of the Project pose risks to communities? (e.g. collapse of buildings or infrastructure)	1	1	1	1	1	5	Component 2 project concept screening tools are recommended for adoption to ensure that this risk is mitigated for all potential applications. Project specific mitigation measures for large scale infrastructure development will need to be potentially set up as required; though this risk is highly unlikely to occur (being screened out of the application process).
		4.4 Would the proposed Project be susceptible to or lead to increased vulnerability to earthquakes, subsidence, landslides, erosion, flooding or extreme climactic conditions?	1	1	3	1	1	7	For each EDA grant funded application, site selection, design, and preparatory baseline studies are required to ensure that the approach will minimize vulnerability to impacts from hurricanes, flooding, and erosion.
		4.5 Would the Project result in potential increased health risks (e.g. from water-borne or other vector-borne diseases or communicable infections such as HIV/AIDS)?	2	2	3	2	1	10	Component 2 Programmes may include water storage and rainwater harvesting techniques for specific areas which have potential to breed mosquitoes and impact water quality depending on storage time and quality of water. Monitoring and a user education program for maintenance will need to be integrated within the project designs to reduce these problems.
		4.6 Does the Project pose potential risks and vulnerabilities related to occupational health and safety due to physical, chemical, biological, and radiological hazards during Project preparatory phases, operation, or decommissioning?	1	2	1	1	1	6	This is deemed an unlikely risk. Project specific mitigation measures for the possibility of occupational health and safety due to physical, chemical, biological, and radiological hazards during project preparatory phases will need to be potentially set up as required; though this risk is highly unlikely to occur

PS	Objectives	Description	D	O	E	Du	R	TI	Explanation *Mitigation*
									(being screened out of the application process).
		4.7 Does the Project engage security personnel that may pose a potential risk to health and safety of communities and/or individuals (e.g. due to a lack of adequate training or accountability)?	1	1	1	1	1	5	This is deemed a manageable risk. Lack of adequate training or accountability will need to be potentially set up as required; though this risk is highly unlikely to occur should effective training be embraced within Component 1 of the Programme. With national approval, the CCCCC could train national project developers or help to move the project from concept to a project proposal; hence mitigating conflict with activities that might fall outside its scope.
		4.8 Does the project pose potential risks for sexual exploitation and sexual abuse?	1	1	3	1	1	7	The CABRIC Programme is not expected to generate high or systematic risks of sexual exploitation, abuse or harassment (SEAH). The programme does not involve large-scale civil works, labour camps, resettlement, or the long-term presence of external contractors embedded in communities, which are typically key structural drivers of elevated SEAH risk. Most activities will be implemented through government agencies, NGOs, and community-based partners, and will consist primarily of technical assistance, capacity building, ecosystem-based interventions, and small-scale livelihood support. Nevertheless, the programme will operate across multiple Caribbean countries and will involve direct engagement with vulnerable groups, including smallholder farmers, women, youth, and Indigenous and marginalised communities. These engagement modalities create contextual SEAH risks related to power asymmetries between project staff or EEs and community

PS	Objectives	Description	D	O	E	Du	R	TI	Explanation *Mitigation*
									members, particularly in settings where gender inequality, economic vulnerability, and limited access to formal grievance systems are present. Potential SEAH risk pathways include: (i) inappropriate behaviour by project staff, consultants, or EEs during field missions, training activities, or community consultations; (ii) transactional risks linked to access to project benefits or livelihood support; and (iii) harassment or abuse occurring within implementing institutions or local partner organisations.
PS5	Land Acquisition and Involuntary Resettlement Avoid/minimize adverse social and economic impacts from land acquisition or restrictions on land use Improve or restore livelihoods and standards of living Improve living conditions among displaced persons by providing	5.1 Would the Project potentially involve temporary or permanent and full or partial physical displacement?	1	1	1	1	1	5	Land to be used for project would not displace any inhabitants. Because physical displacement is strictly prohibited, Resettlement Action Plans (RAPs) are not applicable. If a project requires physical displacement, it is immediately rejected. For unavoidable, minor economic displacement, a Livelihood Restoration Plan (LRP) is triggered
		5.2 Would the Project possibly result in economic displacement (e.g. loss of assets or access to resources due to land acquisition or access restrictions – even in the absence of physical relocation)?	1	1	1	1	1	5	Land required for a specific EDA grant funded project (e.g.: PV infrastructure or rainwater harvesting for agriculture at some sites) may limit other forms of development or agriculture production in the future even though they are currently not being used by government or private land owners. However, a land acquisition action plan or an economic displacement framework would be automatically raised within the screening process tools if such risks where anticipated to arise.

PS	Objectives	Description	D	O	E	Du	R	TI	Explanation *Mitigation*
									To clarify, while physical resettlement is strictly prohibited, if a sub-project causes unavoidable, minor economic displacement or access restrictions, a Livelihood Restoration Plan (LRP) or compensation framework (e.g alternative livelihood training or direct financial compensation) must be developed. A Project Management Unit (PMU) or Executing Entities define and operationalise a LRP that all sub-grantees must follow if their project triggers access restrictions.
		5.3 Is there a risk that the project would lead to forced evictions?	1	1	1	1	1	5	Land to be used for project would not displace any inhabitants and hence forced evictions would be avoided at all costs. Because physical displacement is strictly prohibited, Resettlement Action Plans (RAPs) are not applicable. If a project requires physical displacement, it is immediately rejected. For unavoidable, minor economic displacement, a Livelihood Restoration Plan (LRP) is triggered
		5.4 Would the proposed Project possibly affect land tenure arrangements and/or community-based property rights/customary rights to land, territories and/or resources?	1	1	1	1	3	7	See answer to 5.3. Also, possibility exists to affect community right to resources when measures taken to rehabilitate areas around infiltration wells or install storage tanks on public spaces. EDA grant funded project design (through community engagement) would provide win-win solutions that build community assets (e.g. accessible green space, artwork as education etc. to make ecosystem services in the recipient country more resilient.
PS6	Biodiversity Conservation and Sustainable Management of Living Natural Resources: Protection and conservation of biodiversity Maintenance of benefits from ecosystem services	6.1 Would the Project potentially cause adverse impacts to habitats (e.g. modified, natural, and critical habitats) and/or ecosystems and ecosystem services? Does the Project involve changes to the use of lands and resources that may have adverse	2	2	3	2	1	10	New physical infrastructure on a large scale cannot be undertaken by the CCCCC. Based on CCCCC accreditation, projects of this nature are automatically disqualified as CCCCC can only undertake projects up to a category B ESS risk. Storage and rainwater harvesting could (Category B project) will be flagged with

PS	Objectives	Description	D	O	E	Du	R	TI	Explanation *Mitigation*
	Promotion of sustainable management of living natural resources Integration of conservation needs and development priorities	impacts on habitats, ecosystems, and/or livelihoods?							appropriate mitigation actions written with the proposal for the specific pilot project.
		6.2 Are any Project activities proposed within or adjacent to critical habitats and/or environmentally sensitive areas, including legally protected areas, areas proposed for protection, or recognized as such by authoritative sources and local communities?	1	1	2	1	1	6	The EDA Component 2 Concept Screening tool process (see Annex 3) should screen out any project approach that may impact on critical habitats or where this is unavoidable, acceptable mitigation strategies will be formally required for each project.
		6.4 Would Project activities pose risks to endangered species?	1	1	1	1	1	5	The EDA Component 2 Concept Screening tool process (see Annex 3) should screen out any project approach that may impact on endangered species or where this is unavoidable, acceptable mitigation strategies will be formally required for each project.
		6.5 Would the Project pose a risk of introducing invasive species?	1	1	1	1	1	5	The EDA Component 2 Concept Screening tool process (see Annex 3) should screen out any project approach that may impact or exacerbate invasive species issues or where this is unavoidable, acceptable mitigation strategies will be formally required for each project.
		6.6 Does the Project involve harvesting of natural forests, plantation development, or reforestation?	1	1	1	3	1	7	The EDA Component 2 Concept Screening tool process see Screening tools in the Appendix of this ESMF) should screen out any project approach that may impact the unsustainable harvesting of natural forests or reforestation issues or where this is unavoidable, acceptable mitigation strategies will be formally required for each project.
		6.6 Does the Project involve the production and/or harvesting of fish populations or other aquatic species?	1	1	1	1	1	5	The EDA Component 2 Concept Screening tool process (see Screening tools in the Appendix of this ESMF) should screen out any project approach that may impact the unsustainable harvesting of fish populations or aquatic species and where this is unavoidable, acceptable mitigation strategies will be formally required for each project.

PS	Objectives	Description	D	O	E	Du	R	TI	Explanation *Mitigation*
		6.8 Does the Project involve significant extraction, diversion or containment of surface or ground water?	1	1	1	1	1	5	The EDA Component 2 Concept Screening tool process (see Screening tools in the Appendix of this ESMF) should screen out any project approach that may impact the diverting or contaminating ground water and where this is unavoidable, acceptable mitigation strategies will be formally required for each project.
		6.9 Does the Project involve utilization of genetic resources?	1	1	1	1	1	5	The use of genetic resources is not planned in any aspect of this Programme.
		6.10 Would the Project generate potential adverse trans-boundary or global environmental concerns?	1	1	1	1	1	5	All materials imported for this project will have to meet international and national laws/regulations. Exports are not expected from this Programme.
		6.11 Would the Project result in secondary or consequential development activities?	2	2	1	2	1	8	Potential for additional activities with more reliable access to coastal or improved water resources. Strong knowledge exchange and outreach component to reduce activities that would result in negative consequences.
PS7	Indigenous Peoples Ensure full respect for indigenous peoples Human rights, dignity, aspirations Livelihoods Culture, knowledge, practices Sustainable and culturally appropriate development benefits and opportunities Free, prior and informed consent in certain circumstances *Risks relating to 7.1, 7.2 and 7.3:* Conflicts between traditional and formal governance systems; changing government policies affecting Indigenous recognition; and exclusion of marginalized groups within Indigenous communities.	7.1 Are indigenous peoples present in the Project area (including Project area of influence)?	1	1	1	3	1	7	Indigenous populations are a key focus in select countries within the program scope, specifically in Belize (Mayan and Garifuna communities). Should EDA-specific applications for projects be proposed in these or other locations where Indigenous Peoples may be present, the project application must include specific requirements to ensure FPIC and/or their active participation and meaningful engagement, in alignment with the GCF Indigenous Peoples Policy. if Indigenous Peoples are collectively identified in a sub-project area, or if projects are specifically designed for IP communities, the initial screening must determine if any of the following conditions apply. These conditions include: 1) activities located on, or developing natural resources on, lands subject to traditional ownership or under customary

PS	Objectives	Description	D	O	E	Du	R	TI	Explanation *Mitigation*
	Risks relating to 7.4: Consent fatigue from repeated consultation; changing community leadership affecting validity of original consent; external pressures influencing consent decisions; and consent withdrawal mid-project. Operational risks include insufficient time or resources for meaningful FPICC processes; and poor facilitation quality undermining trust. *Risks relating to 7.5, 7.8 and 7.9:* traditional knowledge misappropriation or misuse; resistance to information sharing based on protecting sacred knowledge; and project activities inadvertently affecting sacred sites or cultural practices.								use or occupation, particularly where potential adverse impacts—such as loss of access to assets or restrictions on land use—are expected; 2) exceptional circumstances requiring the relocation or displacement of Indigenous Peoples from their communally held lands or natural resources; and 3) activities that may significantly impact cultural heritage (including sacred sites and non-physical cultural expressions) or propose to use it for commercial purposes. If any of these conditions are triggered, the operationalization of project exclusion list or the FPIC/FPICC process must be identified. FPIC must begin as early as possible during the sub-project's design and development phase, prior to the commencement of any activities that may affect the community's rights or interests. To ensure compliance, the ESMF and IPPF mandate that this consent process be iterative, transparent, and culturally appropriate, allowing sufficient time for the community's internal, customary decision-making. Ultimately, documented evidence of a mutually accepted consultation process and a formal consent agreement must be secured before any financing decision, or sub-project approval is finalised. If the screening identifies potential impacts on IPs, a site-specific IPP must also be developed.
		7.2 Is it likely that the Project or portions of the Project will be located on lands and territories claimed by indigenous peoples?	1	1	1	3	1	7	Indigenous populations are a key focus in select countries within the program scope, specifically in Belize (Mayan and Garifuna communities). Should EDA-specific applications for pilot projects be proposed in

PS	Objectives	Description	D	O	E	Du	R	TI	Explanation *Mitigation*
									these or other locations where Indigenous Peoples may be present, the project application must include specific requirements to ensure their active participation and meaningful engagement, in alignment with the GCF Indigenous Peoples Policy. If the screening identifies potential impacts on IPs, a site-specific IPP must be developed and FPIC will be required.
		7.3 Would the proposed Project potentially affect the human rights, lands, natural resources, territories, and traditional livelihoods of indigenous peoples (regardless of whether indigenous peoples possess)	1	1	1	3	1	7	Indigenous populations are a key focus in select countries within the program scope, specifically in Belize (Mayan and Garifuna communities). Should EDA-specific applications for pilot projects be proposed in these or other locations where Indigenous Peoples may be present, the project application must include specific requirements to ensure their active participation and meaningful engagement, in alignment with the GCF Indigenous Peoples Policy. If Screening identifies potential impacts, FPIC is required. Voluntary economic or physical displacement will require FPIC. If the screening identifies potential impacts on IPs, a site-specific IPP must be developed.
		7.4 Has there been an absence of culturally appropriate consultations carried out with the objective of achieving Free, Prior and Informed Consent (FPIC) on matters that may affect the rights and interests, lands, resources, territories and traditional livelihoods of the indigenous peoples concerned?	1	1	1	3	1	7	Indigenous populations are a key focus in select countries within the program scope, specifically in Belize (Mayan and Garifuna communities). Should EDA-specific applications for pilot projects be proposed in these or other locations where Indigenous Peoples may be present, the project application must include specific requirements to ensure their active participation and meaningful engagement, in

PS	Objectives	Description	D	O	E	Du	R	TI	Explanation *Mitigation*
									alignment with the GCF Indigenous Peoples Policy, and so, should EDA specific applications for pilot projects be proposed then it shall be expected that a range of consultative mechanisms are put forward within the concept application to achieve FPIC within any project. FPICC as an iterative process that requires adequate budget and early engagement, it also includes consent withdrawal.
		7.5 Does the proposed Project involve the utilization and/or commercial development of natural resources on lands and territories claimed by indigenous peoples?	1	1	1	1	1	5	Indigenous populations are a key focus in select countries within the program scope, specifically in Belize (Mayan and Garifuna communities). Should EDA-specific applications for pilot projects be proposed in these or other locations where Indigenous Peoples may be present, the project application must include specific requirements to ensure their active participation and meaningful engagement, in alignment with the GCF Indigenous Peoples Policy. If Screening identifies potential impacts, FPIC is required.
		7.6 Is there a potential for forced eviction or the whole or partial physical or economic displacement of indigenous peoples, including through access restrictions to lands, territories and resources?	1	1	1	1	1	5	This risk would be screened out of any application using the tools presented in the Annex of this ESMF. If a proposed intervention were to be undertaken on areas where there are potential impacts on indigenous peoples , a site specific IPP would be required.
		7.7 Would the Project adversely affect the development priorities of indigenous peoples as defined by them?	1	1	1	1	1	5	This risk would be screened out of any application using the tools presented in the Annex of this ESMF. If a proposed intervention were to be undertaken on areas where there are potential

PS	Objectives	Description	D	O	E	Du	R	TI	Explanation *Mitigation*
									impacts on indigenous peoples, a site specific IPP would be required.
		7.8 Would the Project potentially affect the physical and cultural survival of indigenous peoples?	1	1	1	1	1	5	This risk would be screened out of any application using the tools presented in the Annex of this ESMF. If a proposed intervention were to be undertaken on areas where there are potential impacts on indigenous peoples, a site specific IPP would be required.
		7.9 Would the Project potentially affect the Cultural Heritage of indigenous peoples, including through the commercialization or use of their traditional knowledge and practices?	1	1	1	1	1	5	This risk would be screened out of any application using the tools presented in the Annex of this ESMF. If a proposed intervention were to be undertaken on areas where there are potential impacts on indigenous peoples, a site specific IPP would be required. Any sub-project intending to use traditional ecological knowledge (TK) must establish clear intellectual property protection protocols, community-controlled documentation processes, and formal benefit-sharing agreements with the knowledge holders prior to approval. The PMU is required to establish standard protocols distinguishing shareable from sacred/protected knowledge.
PS8	Cultural Heritage	8.1 Will the proposed Project result in interventions that would potentially adversely impact sites, structures, or objects with historical, cultural, artistic, traditional or religious values or intangible forms of culture (e.g. knowledge, innovations, practices)? (Note: Projects intended to protect and conserve Cultural Heritage may also have inadvertent adverse impacts)	1	1	3	3	1	9	The EDA Component 2 Concept Screening tool process (see Appendix of this ESMF) should screen out any project approach that may impact the cultural environment and where this is unavoidable, acceptable mitigation strategies will be formally required for each project. See answer relating to TK in 7.9.
		8.2 Does the Project propose utilizing tangible and/or intangible forms of	1	1	3	1	1	7	The Programme (for specific grant funded pilot projects) may develop learning materials for

PS	Objectives	Description	D	O	E	Du	R	TI	Explanation *Mitigation*
		cultural heritage for commercial or other purposes?							knowledge exchange throughout the timeline of the Programme for specific applicants. It is desired that these materials be culturally and nationally relevant and therefore some might incorporate cultural heritage where possible.

4. Environmental and Social Risk Management Plans

To ensure effective management of environmental and social risks, the project will deploy a suite of dedicated safeguard instruments. These tools are designed to translate overarching commitments into clear, actionable steps throughout the project lifecycle, from planning and design to implementation, monitoring, and closure.

4.1 Environmental and Social Management Framework (ESMF)

At the core of this approach is the EMSF, which outlines the guiding principles, procedural requirements, and institutional arrangements that govern safeguards compliance across all project activities. The ESMF serves as the foundational reference for risk mitigation, monitoring, and capacity-building efforts.

4.2 ESS Screening Forms and subproject specific Environmental and Social Management Plans (ESMPs)

Given the project interventions, sites will be identified during the implementation phase and the anticipated large number of subprojects involving similar types of interventions with comparable environmental and social risk profiles. Individual applicants at the site-specific level can apply for these subprojects.

The Operations Manual states that if a project is ranked as medium/moderate risk, the applying organization is required to develop a site-specific ESMP/EMMP as part of their application. The manual also differentiates by grant size, stating small grants need an ESS framework (risk mitigation plan), while Medium and Large grants specifically require an ESMP.

4.3 Labor Management Procedure (LMP)

To ensure that project implementation adheres to international labour standards, the CCCCC IP Policy and CCCCC Environmental and Social Management System, the project will adopt enhanced labour risk management protocols in line with IFC Performance Standard 2. These measures are important as each of the five target countries exhibit elements of economic fragility, informal labour, and elevated risks of exploitation, particularly for vulnerable and displaced populations. The project will implement a Labor Management Procedure (LMP), which provides guidance on fair and transparent recruitment practices, occupational health and safety (OHS) standards, arrangements for workers to raise complaints and concerns through the overall project grievance mechanism, and measures to prevent child labour.

An indicative Labor Management Procedure (LMP) has been prepared and included in Annex 1 of this document. This LMP outlines:

- Types of workers likely to be engaged (direct workers, contracted workers, community labour);
- Terms and conditions of employment;
- Occupational health and safety (OHS) obligations;
- Prohibition of child labour, forced labour, and gender-based violence;
- Requirements for equal opportunity, non-discrimination, and protection of vulnerable workers

This framework will guide all labour-related aspects of subproject implementation and will be updated or expanded as needed during project roll-out.

Labor Grievance Mechanism and Record-Keeping
All contractors and implementing partners will be required to establish a site-level Labor Grievance Register, which will:

- Log all labour-related complaints (e.g., harassment, wage disputes, unsafe conditions);
- Disaggregate complaints by grievance type, gender, resolution status, and time to closure;

- Be subject to monthly review by CCCCC field staff and safeguards personnel.

Labour-related complaints and concerns from project workers will be received and managed through the overall project grievance mechanism. Anonymous complaints will be permitted, and all grievance logs will be maintained with due regard to confidentiality.

Wage Compliance and Pay Equity

To reduce risks of exploitation in informal and vulnerable labour markets, , the project will require that:

- All contracted workers receive wages that meet or exceed the national minimum wage;
- Equal pay for equal work is ensured across gender, age, and displacement status;
- Contractors provide written contracts in accessible formats, outlining wages, hours, and grievance options.

CCCCC will carry out random site inspections to verify compliance with wage standards, contract conditions, and grievance accessibility. Any breach of labour standards may result in suspension or termination of the contractor's engagement, in accordance with CCCCC procurement rules and international good practice.

Supply Chain Labour Risk Management

In addition to risks associated with direct and contracted workers, the project recognises that labour risks may also arise within the supply chain of materials used in civil works activities, including suppliers of construction materials.

In socio-economic and environmental contexts such as the five target countries, may present risks related to unsafe working conditions, informal labour arrangements, child labour, and environmental degradation.

To address these risks, the project will apply proportionate supply-chain due diligence measures consistent with CCCCC Environmental and Social Management System and the principles of IFC Performance Standard 2.

These measures will include:

- Determining that third parties, such as first-tier suppliers, primary contractors, and primary suppliers, are legitimate and reputable, and that their workers are protected consistently with labor standards;
- Assessing the primary supply chain to identify high risks of child labor, forced labor, or significant safety issues, particularly where the project has reasonable control;
- Taking appropriate steps to correct any identified cases of child labor, forced labor, or trafficked labor within the supply chain;
- Introducing procedures and mitigation measures to ensure that primary suppliers take steps to prevent or correct life-threatening safety situations;
- Monitoring the primary supply chain on an ongoing basis to detect significant changes, new risks, or new incidents of labor abuses so they can be remedied;
- Transitioning the project's primary supply chain over time to use suppliers that demonstrate compliance, in cases where risks cannot be fully addressed or remedied by current suppliers.

Where credible information is received indicating that a supplier is associated with serious labour violations (e.g. child labour, forced labour), the contractor will be required to take corrective measures or identify alternative suppliers. It is noted that SES-related requirements under this project apply to project-specific labour within the monitored supply chain, and do not extend to the broader supply chain beyond the project's sphere of influence.

Occupational Health and Safety (OHS) Training and Incident Reporting

To ensure safe working conditions during construction and operation activities, the project will apply strengthened occupational health and safety (OHS) procedures consistent with national labour regulations, CCCCC Environmental and Social Management System, and international good industry practice which is required by all subprojects.

OHS plan / provisions must be contractually required and integrated into the overall ESMP to protect direct, contracted, temporary, and third-party workers.

- Sector-Specific Working Hazards: Workers face elevated exposures to physical, chemical, biological, or radiological hazards inherent to the project sector (e.g., infrastructure construction or manufacturing engineering).
- Dangerous Worksite Typologies: Tasks require working at significant heights, underground, underwater, handling heavy loads, or operating near specialized heavy machinery and moving equipment.

- Extreme Weather and Climate Exposures: The workforce operates in outdoor settings vulnerable to changing climate trends, requiring protective measures against severe chronic or acute conditions like extreme heat stress or deep freeze events.
- Complex Supply Chains: Core project operations rely on primary suppliers where high baseline risks of dangerous working conditions, child labor, or forced labor are present.
- Vulnerable Worker Demographics: The project employs temporary, migrant, seasonal, or daily wage laborers who face precarious contract terms, language barriers, or restricted access to local legal protection.

All contractors and implementing partners will be required to implement the following measures:

Mandatory OHS Training

- Educating workers on occupational health and safety to minimize accidents;
- Recognising threats to workers, particularly those that may be life-threatening;
- Taking actions to modify, substitute, or eliminate hazardous conditions or substances;
- Keeping records of occupational accidents, diseases, and incidents;
- Establishing arrangements for emergency prevention, preparedness, and response.

Incident Reporting

Implementing Partners are required to ensure a safe and healthy work environment by addressing the documentation and reporting of occupational accidents, diseases, and incidents (including physical, chemical, biological, and radiological hazards, as well as life-threatening threats to workers). They will document:

- Recording information to track performance, verify compliance, and identify necessary corrective actions
- Maintaining a publicly available record that documents the responses to all concerns and grievances received from affected parties related to the project's environmental and social performance

Staff and Implementing Partners are required to refer concerns, incidents, complaints, and feedback regarding CCCCC-supported projects to the designated project grievance mechanism or directly to the CCCCC. Direct reports to the CCCCC can be filed via email at complaints@caribbeanclimate.bz or through their official website. .

Monitoring indicators will include:

- At the facility level, monitoring practices must track Occupational Health, Safety and Social Issues, community health exposure, regulatory compliance status, current health and safety monitoring practices, and the expenditures dedicated to health and safety

4.4 Stakeholder Engagement Plan (SEP)

In parallel, a comprehensive project-level Stakeholder Engagement Plan (SEP) will be enacted to ensure that community consultations are inclusive, transparent, and responsive. The SEP will facilitate two-way communication between project teams and stakeholders, allowing for regular feedback and timely dissemination of relevant information.

4.5 Indigenous Peoples Plan

It is required that a Social Assessment is conducted where indigenous peoples have been identified through screening. Below outlines the process in which these activities are carried out. Indigenous People must be properly consulted in an appropriate manner, including dedicated consultations with IPs on the IPPF and IPPs. All project areas with indigenous peoples' communities will be visited by the Grant Administrator's ESS specialist alongside relevant personnel, local authorities, or focal persons/experienced consultants that have experience working with IPs. The assessment's depth should be proportionate to the nature and scale of the potential risks to and impact on, as well as vulnerability, of the IP. It is also key for the assessment to recognize the differentiated gender impacts of the project activities, especially and women and children may be more affected even within their own community.

The Social Assessment will therefore include the following elements:

1) Review of legal and institutional framework applicable to IPs

2) Baseline data gathered through desk research and consultations with IPs on the demographic, social, cultural and political characteristics of the IP; the land territories that they have traditionally owners or occupied; and the natural resources on which they depend

3) Taking the review and baseline information into account, the identification of key project stakeholders and the elaboration of a culturally appropriate process for consulting with local communities at each stage of sub-project preparation and implementation

4) An assessment, based on free, prior, and informed consultation, with the IPs, of the potential adverse and positive effects of the project. Critical to the determination of potential adverse impacts is an analysis of the relative vulnerability of, and risks to, the affected communities given their distinct circumstances and close ties to land and natural resources, as well as their lack of access to opportunities relative to other social groups in the communities, regions, or national societies in which they live.

5) The identification and evaluation, based on free, prior, and informed consultation with the affected communities, of measures necessary to avoid adverse effects, or if such measures are not feasible, the identification of measures to minimize, mitigate, or compensate for such effects, and to ensure that the Indigenous Peoples receive culturally appropriate benefits under the project. The Social Assessment results are key to integrate into the IPPs that will be prepared for projects.

The Indigenous Peoples Plan (IPP) will be informed and guided by CABRIC's IPPF, GCF's IP Policy and the above Social Assessment. The IPP must be developed in collaboration with the potentially affected indigenous peoples and will be culturally appropriate, time-bound plan. It is important to outline that impact/risk assessment, consultation (incorporating FPIC), identification of co-benefits*, and public disclosure must be completed prior to the National Grant Committees' appraisal and approval.

The IPP is intended to be flexible and pragmatic and should include the following elements:

A summary of the baseline information, including demographic, social, cultural and political characteristics gathered from the social assessment and applicable legal and institutional framework

A summary of the overall Social Assessment

A summary of the results of the free, prior and informed consultation with IP

A framework for ensuring free, prior, and informed consultation tailored to IP during project implementation

Measures for ensuring IP receive social and economic benefits that are culturally appropriate and gender sensitive and steps for implementing them. If necessary, this may call for measures to enhance the capacity of the project grantees and EEs

Measures to avoid, minimize, mitigate, or compensate IP for any potential adverse impacts that were identified in the social assessment, and steps for implementing them.

The cost estimates, financing plan, schedule, and roles and responsibilities for implementing the IPP

Culturally accepted and linguistically appropriate grievance redress mechanisms

4.6 Grievance Redress Mechanism (GRM)

To address community concerns and grievances, project level GRM will be operationalised. This mechanism will provide accessible and culturally appropriate channels for lodging complaints and seeking resolution, ensuring that issues are addressed in a timely and transparent manner. Project GRMs will be refined during the inception phase of CABRIC.

4.7 SEAH Prevention and Response Protocol

The project will implement CCCCC Environmental and Social Management System, which addresses SEAH (Sexual Exploitation and Abuse and Harassment). This regulatory framework will uphold strong safeguarding standards. Including for children and establish clear procedures for preventing and responding to incidents of sexual exploitation and abuse.

In the Gender Assessment (Annex 8a) and Action Plan (Annex 8b), SEAH mitigation actions are included.

4.8 Biodiversity Impact Checklists – Biodiversity Management Plan (BMP)

All Component 2 subprojects located in or near ecologically sensitive areas (such as already stressed coastal, watershed and reef systems) will be screened using a dedicated Biodiversity Impact Checklist. This checklist will be part of the environmental and social screening package (Annex 2) and will assess:

- Proximity to critical habitats or protected areas;
- Presence of natural habitats, ecological corridors, or seasonal wetlands;

- Likely disturbance to flora or fauna during construction or operation;
- Local use of plant or animal species with conservation concern.

Where potential risks are identified, a sub project specific Biodiversity Management Plan (BMP) may be developed as part of the cluster-level ESMPs.

No Introduction of Invasive Species Protocol

To safeguard native ecosystems during watershed or reef protection activities (e.g plantation and restoration), the project will apply a strict "No Introduction of Invasive Species" protocol. This will include:

- Mandatory use of native species for all replanting or restoration activities;
- Prohibition of exotic, fast-growing, or invasive species unless approved through documented ecological risk assessment;
- Site-level species selection validated by local environmental authorities or biodiversity experts.

4.9 Process Framework Outline

A process framework serves as a structured, technical roadmap to assist AEs and NDAs in systematically aligning climate change interventions with the GCF's Environmental and Social Policy (ESP) throughout the project lifecycle. A typical process framework outline includes:

- Phase 1: Upstream Screening and Risk Categorization (Concept Note Stage)
- Phase 2: Comprehensive Environmental and Social Assessment (Funding Proposal Development)P
- Phase 3: Development of Management Frameworks and Action Plans
- Phase 4: Stakeholder Engagement, Disclosure, and Grievance Redress
- Phase 5: Project Implementation, Monitoring, and Adaptive Management

The CABRIC programme does not map out specific geographical restricted zones as instead it establishes the operational triggers and mitigation pathways for these restrictions through its core components and co-benefits:

1. Participatory Identification and Mapping of Restricted Zones.

The identification of restricted zones will be initiated during the early sub-project appraisal phase and will be deeply embedded within Activity 1.1.1 (Conduct participatory community climate vulnerability and risk assessments). When a sub-project proposal under the Grants Facility involves the active restoration or conservation of degraded coastal, marine, or terrestrial ecosystems (as tracked under Co-benefit 3), the relevant National EE, such as the Belize Fund, JSIF or Saint Lucia Development Bank, must execute a highly participatory spatial mapping exercise. Rather than imposing top-down boundaries, the PMU and Country Facilitators will utilise community-validated GIS and collaborative boundary-delimitation workshops to explicitly define the temporary, permanent, or seasonal closure zones required for ecological recovery. These mapping sessions will explicitly outline the coordinate boundaries of restricted zones and determine the duration of the access limits, ensuring that the local governance structures and traditional resource custodians are the primary co-designers of the conservation boundaries, thereby minimizing spatial conflict from the outset.

2. Baseline Diagnostic of Current Customary Livelihood Activities.

Simultaneously, the project will execute a comprehensive socio-economic baseline diagnostic to catalog all current customary livelihood activities occurring within or adjacent to the newly designated restricted zones. Moving beyond basic employment registries, this process will utilize Activity 1.3.2 (Build institutional capacity for project implementation through a community mentorship model) to build local capacity in tracking resource dependency. The baseline assessment will document customary activities, including nearshore artisanal fishing, mangrove wood harvesting, gleaning of marine invertebrates by women's cohorts, and small-scale subsistence farming. This data collection will be disaggregated by sex, age, and vulnerability status to ensure compliance with the project's gender-transformative mandates, capturing the informal economic contributions of marginalized sub-groups who lack formal titles but maintain ancestral, customary user rights to the coastal zone. The resulting data will serve as the official eligibility baseline, locking in the identity and economic status of affected resource users to ensure that compensation and alternative resource allocations are highly targeted and insulated from elite capture.

3. Step-by-Step Mechanisms to Avoid Economic Displacement:

To systematically prevent economic displacement and satisfy the PS5 criteria, the project will implement a mitigation mechanism executed through Component 2 (Grants Facility) and the CABRIC Technical Helpdesk.

- Step 1: Spatial and Temporal Optimisation: Prior to finalizing any closure, the National EE and sub-project proponents must demonstrate that the conservation zones have been spatially or temporally optimized (e.g. rolling seasonal closures instead of permanent bans) to maintain maximum safe customary access to vital fishing and farming grounds.
- Step 2: Co-Management Agreements: Where resource restriction is unavoidable, the project will draft binding Co-Management Agreements that grant affected traditional users preferential, regulated access to alternative, non-degraded zones or authorize them as paid ecological wardens, providing an immediate replacement income stream.
- Step 3: Livelihood Diversification Sub-Grants: For users facing total loss of access, Component 2 will fast-track dedicated sub-grants aimed at livelihood diversification and economic security. These sub-grants will finance alternative economic pathways, such as sustainable aquaculture, value-added agro-processing, or ecotourism infrastructure, directly monitored under the logframe's diversification indicators.
- Step 4: Continuous Accountability and Recourse: the transition will be supported by Activity 1.3.1's helpdesk framework and a localised GRM allowing affected persons to securely lodge complaints if transitional support is delayed or insufficient, with corrective actions enforced.

4.10 Chance Find Procedures & Cultural Heritage Management Plan (CHMP)

A project must establish a Chance Find Procedure if it involves physical ground disturbance. A comprehensive Cultural Heritage Management Plan (CHMP) is required if there is any potential impact on cultural heritage.

- Subsurface Construction Elements: Siting, excavation, or earthmoving occurs in geographical areas with a high historical probability of containing undiscovered archaeological remains, fossils, or human burial grounds.
- Tangible Cultural Property Intersection: The footprint directly impacts known prehistoric, historic, artistic, or religious structures, properties, or ancestral ruins.
- Sacred Natural Features: Activities cross or alter unique natural features that embody deep cultural or spiritual values for local populations, such as sacred groves, rocks, lakes, or waterfalls.

See Annex 3 for a CABRIC Chance Finds Procedure.

5. Environmental and Social Action Plan (ESAP)

The Environmental and Social Action Plan (ESAP) for the Programme provides a structured approach in predicting, identifying, assessing, mitigating and management of environmental and social risks and impacts at the sub-project level. CCCCC is guided by the "precautionary principle" and therefore applies the risk mitigation hierarchy. Key environmental and social risks associated with the project and outlines mitigation measures to ensure compliance with applicable safeguard policies. The risks identified align with IFC Performance Standards, covering a range of issues including environmental and social risk management, labour conditions, resource efficiency, community health and safety, land acquisition, biodiversity conservation, indigenous peoples, and cultural heritage and Stakeholder Engagement and Informed Discloser a ninth performance in the CCCCC ESMS

The ESAP defines time-bound actions required at PMU, EE and grantee levels to operationalise this ESMF. Actions include (i) finalisation of CABRIC screening tools; (ii) rollout of mandatory training; (iii) integration of EMMPs into grant templates; (iv) development of a SEAH protocol for all EE; (v) establishment of a consolidated E&S reporting system; (vi) annual ESS performance reviews

Under Performance Standard 1, the primary risk arises from the lack of detailed Environmental and Social Impact Assessments (EISAs) at this stage. While the project incorporates strong governance measures such as a Gender Policy, a Stakeholder Consultation Strategy, a Risk Register and a risk watch list, there remains a need to strengthen engagement efforts. To mitigate this, the CABRIC PMU, CANARI and the other EEs will support both national duty bearers and grantees to enhance their capacity for E&S risk screening, stakeholder engagement and safeguards-compliant project design and implementation. Additional ESAP actions under PS1 will include: (i) updating and rolling out the CABRIC-specific screening and categorisation tools to all EEs in alignment with the CCCCC E&S Risk Screening Checklist; (ii) integrating EMMP/ESMP requirements into grant agreements; and (iii) establishing a consolidated E&S reporting template to be used by EEs for periodic reporting to the PMU.

Gender disparities in job representation have been noted, with men predominantly occupying technical roles and women engaging more in knowledge management and education. To address this, a Gender and Infrastructure training component will be developed to integrate gender considerations into project design and implementation. Furthermore, the project will actively promote non-discrimination and equal opportunity hiring practices through its contracts.

With regard to Performance Standard 3, adaptation activities under Component 2 could temporarily introduce pollutants to new areas, potentially affecting local ecosystems. While the risk is considered low, the project will implement a Sustainable Procurement System under Component 1 to minimize pollution impacts. Additionally, community grants and partnerships with local e-waste businesses will be leveraged to enhance environmental sustainability. Under Performance Standard 4, the project acknowledges the vulnerability of communities to climate change and will utilize the Revolving Fund and community grants to build resilience. Public-sector interventions will be designed to promote ecosystem-based adaptation and ensure positive social outcomes.

Land acquisition and involuntary resettlement (Performance Standard 5) do not present significant risks under this project, as no resettlement is planned, nor will be approved. However, in cases where informal land occupants occupy hazard zones targeted for adaptation actions, appropriate documentation and alternative solutions will be considered to prevent displacement. In line with Performance Standard 6, biodiversity conservation will be ensured through rigorous environmental screening to align projects with national biodiversity strategies and applicable legal frameworks.

Regarding Performance Standard 7, indigenous peoples are primarily present in Belize. While immediate risks to cultural heritage are minimal, the project will adhere to screening tools outlined in the ESMF to identify any risks emerging from pilot projects. Indigenous communities will also be included in stakeholder engagement and capacity-building activities under Component 1. Finally, Performance Standard 8 does not identify significant risks related to cultural heritage, and no specific mitigation measures are proposed.

Each mitigation measure outlined in this ESAP will be implemented according to a defined schedule, with responsibilities assigned to relevant stakeholders. Indicators and targets will be established to monitor progress, and cost estimates will be provided to ensure feasibility. Some measures, such as the Gender and Infrastructure training component, are built into specific project activities, while others, such as the Sustainable Procurement System, are overarching measures applicable to all project components. By implementing these actions, the CABRIC project will enhance environmental and social sustainability while mitigating potential risks effectively. Table 4.4 extracts those risks in Table 4.3 that fall under the 8 GCF PS with a TI > 10.

Table 4 Environmental and Social Action Plan for the programme

IFC Performance Standards	Programme Risk Assessment	Mitigation Measures
Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts	At this stage, there are only indicative activities to be funded by the EDA, and so Environmental and Social Impact Assessments (ESIAs) and other risk management measures, have not been conducted at this stage. The policies in place by the Accredited Entity to guide Environmental and Social Risks and Impacts include: Policy on ESS, a Gender Policy, the Code of Conduct and Ethics, the Complaints Mechanism, a Stakeholder Consultation Strategy, and the Risk Register. Project partners and all Committees involved in decision-making will be trained on these policies and procedures under Component 1 of the project. All five participating countries have common legal frameworks for managing environmental and social risks, for example, by requiring that ESIAs be developed as part of the physical planning approval process. This is the process for identifying the environmental and social risks and impacts of the project, and managing risks during implementation.	National duty bearers (NDAs etc) are committed to the programme and have requisite capacity to meet obligations. Efforts are needed to ensure that screening checklist outlined in the Annex of this ESMF are adhered to thus ensuring that Pilot Projects are designed to engage and include vulnerable populations and all stakeholders.
Performance Standard 2: Labour and Working Conditions	There are four core labour rights per the ILO: 1) the right to collective bargaining, where employers and workers discuss and negotiate their relations (unions, etc); 2) elimination of forced labour; 3) elimination of child labour; and 4) elimination of discrimination in employment. The five target countries are believed to have strong national labour laws and standards developed after long colonial rule. These enshrined labour rights are now part of the cultural and political dynamics and there would be severe political consequences to the respective Governments if these were to be violated. The project will be implemented in compliance with legislation including the national Labour Code in each pilot country. No child labour or forced labour is expected to result from this project.	Project includes strong gender component to address gender equality so impacts will be positive and not adverse. The project has components with disparate representation of men and women with men being more prevalent in the jobs required for any installations, mains replacement etc. and women being more prevalent in knowledge management, education and outreach. The project will need to develop and implement a Gender and Infrastructure training component that would integrate women in design phases and address gender throughout all aspects of the project cycle. Despite health and safety concerns to be of low risk, nonetheless, a dedicated SEAH risk assessment has been written which prohibits any conduct that constitutes SEAH and requires all contracted parties to protect beneficiaries and communities from such harms.

IFC Performance Standards	Programme Risk Assessment	Mitigation Measures
	All subprojects at each country level shall prepare and implement a site-specific OHS Plan (as part of the ESMP/EMMP), proportionate to the level of risk identified through environmental and social screening. The project will seek to leverage its works and services contracts to actively promote non-discrimination and equal opportunity hiring practices. With specific reference to Risks 2.2 and 2.3 (Table 4.3) mitigation measures are proposed.	
Performance Standard 3: Resource Efficiency and Pollution Prevention	Adaptation through specific individual projects (within Component 2 in particular) could temporarily cause pollutants to reach previously unaffected areas of the community if (for example) the activity influences the performance or health of coasts or waterways. Whilst this risk has a low potential impact, the CCCCC can further reduce pollution risk through the use of community grants and by partnering with local e-waste businesses and initiatives (for example).	The project will need to develop and implement a Sustainable Procurement system for EDA implementation designed under Component 1, to reduce any pollution impact of adaptation inputs. sustainable procurement to lower the cost of individual national procurements.
Performance Standard 4: Community Health, Safety, and Security	The public-sector adaptation actions will include social impact analysis for affected communities once the Government agency has submitted a Concept Note. Public sector interventions are designed to promote ecosystem-based adaptation, which are hoped to demonstrate positive externalities. No risks relating to PS4, as outlined in Table 4.3 scored 10 or above, and so, no specific mitigation measures are proposed in this Table.	The project will be working in climate vulnerable communities. Communities that are already subjected to impacts from climate change may also experience an acceleration and/or intensification of impacts due to project activities. Therefore, the Revolving Fund and the community grants have been designed to empower communities to improve climate resilience. Despite there being, no risks being scored above 10, nonetheless, a dedicated SEAH risk assessment has been written which prohibits any conduct that constitutes SEAH and requires all contracted parties to protect beneficiaries and communities from such harms.
Performance Standard 5: Land Acquisition and Involuntary Resettlement	There will be no involuntary resettlement under either component of this project, and mechanisms are in place to ensure unidentified projects (Component 2) do not result in involuntary resettlement (see tools in this Annex 3). The risk is that there may be informal land occupantsin hazard zones where adaptation actions are potentially proposed. The project will	

IFC Performance Standards	Programme Risk Assessment	Mitigation Measures
	document these situations and make recommendations for solutions that do not result in involuntary resettlement. No risks relating to PS5 in Table 4.3 scored 10 or above, and so, no specific mitigation measures are proposed in this Table.	
Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	The five target countries all have in place National Biodiversity Strategy and Action Plans (NBSAP) and are members of the Convention on Biological Diversity. The project will ensure through environmental screening that all projects are confined to moderate ESS risk and are consistent with NBSAP. Adhere to laws and requirements of habitat and species protection, restoration, and monitoring. With specific reference to Risk 6.1 (Table 4.3) mitigation measures are proposed.	Any activity proposed in any EDA grant funded pilot project shall be of either Category B or C, aligned with CCCCC accreditation requirements, and where there is moderate ESS risk, appropriate actions to mitigate this risk must be articulated in the proposed project.
Performance Standard 7: Indigenous Peoples	There is low risk that there will be conflicts between traditional and formal governance systems; changing government policies affecting Indigenous recognition; and exclusion of marginalized groups within Indigenous communities. There is risk of insufficient time or resources for meaningful FPICC processes; and poor facilitation quality undermining trust. There is low risk for traditional knowledge misappropriation or misuse; resistance to information sharing based on protecting sacred knowledge; and project activities inadvertently affecting sacred sites or cultural practices.	Should EDA-specific applications for projects be proposed in these or other locations where Indigenous Peoples may be present, the project application must include specific requirements to ensure FPIC and/or their active participation and meaningful engagement, in alignment with the GCF Indigenous Peoples Policy. CABRIC is compelled to respect where consent is withheld or withdrawn by Indigenous People. CABRIC is equally compelled to allow for adequate time to ensure meaningful consultation and to secure culturally appropriate FPIC. FPIC must begin as early as possible during the sub-project's design and development phase, prior to the commencement of any activities that may affect the community's rights or interests. If Indigenous Peoples are collectively identified in a sub-project area, or if projects are specifically designed for IP communities, the initial screening must determine if any of the following conditions apply. These conditions

IFC Performance Standards	Programme Risk Assessment	Mitigation Measures
		include: 1) activities located on, or developing natural resources on, lands subject to traditional ownership or under customary use. 2) exceptional circumstances requiring the relocation or displacement of Indigenous Peoples from their communally held lands or natural resources; and 3) activities that may significantly impact cultural heritage (including sacred sites and non-physical cultural expressions) or propose to use it for commercial purposes. If any of these conditions are triggered, the operationalization of the FPIC process or project exclusions must be identified. Where any of the identified low risks of 7.6,7.7,7.8 and 7.9 materialize, the project would be screened out of any application, using the tools presented in the ESMF. If the screening identifies potential impacts on IPs, a site-specific IPP must also be developed.
Performance Standard 8: Cultural Heritage	No risks in Table 4.3 scored 10 or above and so no specific mitigation measures are proposed in this Table.	

6. Sexual Exploitation, Abuse, and Harassment (SEAH) Risk Assessment

All project contracts, including those with staff, consultants, and third-party service providers, will explicitly mandate strict adherence to a zero-tolerance policy and take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to women against Sexual Exploitation, Abuse, and Harassment (SEAH) and Gender-Based Violence (GBV).[3] In alignment with the Green Climate Fund (GCF) Policy on Prohibited Practices, this prohibits any conduct that constitutes SEAH and requires all contracted parties to protect beneficiaries and communities from such harms. Non-compliance with this policy represents a fundamental breach of contract and will result in immediate disciplinary action, up to and including contract termination and legal referral. Furthermore, specialists and contracted workers must actively adhere to the project's Code of Conduct and participate in SEAH awareness-raising activities as specified in the GAAP and ESMF.

6.1 Baseline context

Even though SEAH and GBV risks are considered low due to the CABRIC programme avoiding the typical structural drivers that elevate SEAH risks, project-related SEAH and GBV risks might occur. First, the nature of the interventions places project staff, contractors, and consultants in positions of power during close engagement with vulnerable beneficiaries. Secondly, this risk is compounded by the severe contextual vulnerabilities created by recent extreme weather events, particularly Hurricanes Beryl. Post-disaster environments lead to widespread displacement and economic stress. This desperation can drive vulnerable individuals, particularly women and youth, into coercive or transactional relationships for essential aid, recovery materials, or loans.

While the above are particularly true for project beneficiaries, project staff can also be affected by the underlying conditions and is vulnerable to sexual gain or sexual harassment, especially when exposed in remote areas they may suffer from harassment and verbal sexual abuse.

To mitigate these risks, under Performance Standard 2, a healthy and safe work environment will be provided for project staff and workers. The GESI specialist will ensure that all communities are informed about the GRM systems outlined in this document and the GAP. This GRM system, which uses an understandable and transparent process that provides timely feedback, has been designed with multiple levels to be survivor-centric and responsive to the unique and specific needs and risks for women in the five target countries. Throughout all levels and steps of the GRM process, confidentiality and respondent protection will have the utmost priority, and it does not impede access to other judicial or administrative remedies that might be available under the law. In line with this approach, the following principles will be systematically applied through all steps and actions:

The rights, needs, and wishes of the survivor (or victim) is the foremost priority of everyone involved with the project. The survivor has a right to:

- be treated with dignity and respect instead of being exposed to victim-blaming attitudes.
- choose the course of action in dealing with the violence instead of feeling powerless.
- privacy and confidentiality instead of exposure.
- non-discrimination instead of discrimination based on gender, age, race/ethnicity, ability, sexual orientation, HIV status or any other characteristic.
- receive comprehensive information to help her or him make their own decision instead of being told what to do.

The safety of the survivor shall always be ensured. Potential risks to the survivor will be identified and action take to ensure the survivor's safety and to prevent further harm including ensuring that the alleged perpetrator does not have contact with the survivor. If the survivor is an employee of the programme, reasonable adjustments may be made to the survivor's work schedule and work environment to ensure their safety.

[3] This SEAH Risk Assessment will be in accordance with Performance Standard 2

- All actions should reflect the choices of the survivor.
- All information related to the case must be kept confidential and identities protected. Only those who have a role in the response to an allegation should receive case-level information, and then only for a clearly stated purpose and with the survivor's consent. This applies to any documentation, or reports related to the case. Identities will not be revealed unless explicit written consent is provided by the survivor.
- The survivor must provide informed consent to progress with each stage of the complaints process. Survivors may withdraw their consent at any time during the process.

See section 9.1.1 for a dedicated SEAH channel (GRM).

Outside of potential discrimination against women, the project will integrate SEAH training to all affiliated staff, contractors, and training consultants. Also, it will include specific SEAH zero-tolerance procurement mechanisms across all project contracts and SEAH awareness raising modules targeted to beneficiary communities across all project outcomes. This will include information about potential SEAH risks, the project's Code of Conduct, available GRM, as well as specific SEAH prevention and attention.

A Code of Conduct prohibiting SEAH will be developed and will also explicitly state that the project will not employ forced labor (including indentured or bonded labor) and will not employ trafficked persons. Additionally, it will prohibit the employment of children in any manner that is economically exploitative, hazardous, or harmful to their development. This should be signed by all project staff at the same time the work contract is signed and must be made available in languages the staff understand.

The PMU of the project will also appoint a focal person to ensure compliance with SEAH requirements as well as carrying out regular monitoring of health, working conditions, and hours of work of the project staff. This will include; (i) Tracking whether reporting mechanisms are being used – looking at where reports are coming from/not coming from, and seeking to identify patterns; (ii) Asking workers and community members if they are aware of and trust reporting mechanisms, understand their rights and what constitutes SEAH; (iii) Checking whether workers demonstrate knowledge and understanding of the policy and code of conduct – and can locate them; (iv) Checking whether community members have knowledge of what behaviours to expect from project/program workers and which are prohibited; and (v) Checking mitigation measures are consistently being implemented – e.g., undertake spot checks to see if contracts include clauses, use basic records to track whether SEAH training is being delivered, check reporting mechanisms are functioning, use monitoring visits to check whether awareness-raising materials are clearly visible and engaged with as well as monitoring for indicators of involuntary or compulsory labor.

SEAH specific Activity	Description of Risk	Vulnerable Groups	Mitigation measure	Indicators	Targets	Timeline	Human resources	Budget
Abuse of Power	Direct project staff, contracted workers and consultants hold positions of power regarding the distribution of program inputs (e.g., aid, recovery materials, loans). In post-disaster contexts, desperation can drive individuals into coercive or transactional relationships to access these essentials.	• Women • Youth • Vulnerable individuals facing economic stress or displacement.	A Code of Conduct, including specifically the prohibition of SEAH and forced labor, is designed, socialized with all project related stakeholders (affiliated staff, contractors, training consultants, model farmers) and implemented across activities. Human Resources and project contractors will be obligated to identify	Indicators: A) # of project's code of conduct for the project staff and beneficiaries designed, socialized, and implemented across activities. b) # of SEAH, GBV, human trafficking and child exploitation specific training for project staff	Targets: a) 1 b) 1 annually c) 100% d) 1 e) 100%	Y1-6	GESI specialist responsible for SEAH and GBV prevention and mitigation SEAH and GBV trained trainers	See Annex 4

Lack of Reporting & Awareness	Community members may not be aware of SEAH policies or the available Grievance Redress Mechanisms (GRMs). There is a discrepancy between reported incidents and national statistics, suggesting underreporting due to stigma, fear, or viewing violence as a "private matter".		the presence of children under the age of 18, to prevent them from engaging in any hazardous project work. SEAH-specific and how to identify the signs of human trafficking / child exploitation trainings for internal team and project affiliated staff, (contractors, training consultants, model farmers) will be developed, including the project's Code of Conduct, SEAH prevention and attention protocols, and project's GRM. Trainings will include time for mapping support services for survivors in remote locations and also those that have been victims of child labor and human trafficking. A programme-level GRM is in place and socialized with all relevant stakeholders, including specific confidential , safe and anonymous channels for SEAH and child (and human) exploitation.	c) % of project procurement instruments that integrate zero-tolerance SEAH clauses. d) # of GRM in place and socialized e) % of project-related trainings and capacity-building activities that include SEAH and GBV awareness raising module and materials				

7. Environmental and social screening and approval process

7.1 Purpose of the screening and approval process

The purpose of the screening and approval process is to ensure that all CABRIC-supported projects are consistent with the Green Climate Fund (GCF) Environmental and Social Safeguards, the CCCCC Environmental and Social Management System (ESMS), and the national environmental and social requirements of each participating country.

Screening identifies the level of risk associated with proposed community-based adaptation projects, assigns an environmental and social risk category (C or B only), determines the need for environmental and social mitigation instruments (EMMP or ESMP, need for FPIC or IPP), and ensures that ineligible or high-risk activities (Category A) are excluded from funding.

7.2 Overview of roles and responsibilities in screening

Screening and approval responsibilities are decentralised under the CABRIC umbrella programme model, with the following roles:

Grant administrators (The Bahamas Protected Areas Fund, Grenada Investment Development Corporation, Saint Lucia Development Bank; JSIF for Jamaica; Belize Fund for Belize):

- Lead screening of EOIs and full proposals.
- Conduct ESS, GEDSI, SEAH, and labour risk screening.
- Assign risk categories (C or B) using the CABRIC Screening Form.
- Identify and ensure development of EMMPs/ESMPs where required.

Integrate mitigation measures into grant agreements.
Monitor safeguards implementation by grantees.

- Report to the PMU on E&S performance.Identification of Indigenous Peoples' presence and the application of IPPF protocols during their screening processes
- Ensure alignment with project level grievance redress mechanism

National facilitators

- Support community groups on EOI and proposal development.
- Ensure proponents understand E&S requirements.
- Help identify contextual and national regulatory risks.
- Identification of Indigenous Peoples' presence and the application of IPPF protocols during their screening processes

Project Management Unit (PMU – CCCCC)

- Provides quality assurance and harmonisation of screening processes.
- Consolidates screening outcomes from EEs into a programme-wide risk register.
- Oversees consistency with the ESMF and GCF ESS.
- Provides targeted technical support through the PMU ESS expert.
- Escalates non-compliance and provides corrective actions.
- Reports consolidated E&S performance to the Steering Committee and GCF.
- Identification of Indigenous Peoples' presence and the application of IPPF protocols during their screening processes.
-

National Environmental Authorities

- Review activities requiring permits.
- Ensure national environmental compliance.

7.3 Steps in the screening and approval process

The CABRIC screening and approval process has five stages:

Step 1 – Initial EOI Screening

National Coordinators, supported by an external consultant to jointly review EOIs to verify:

- Alignment with CABRIC themes and outcomes
- Basic feasibility and absence of Category A elements
- Preliminary environmental, social, and GEDSI considerations
- Realistic engagement with communities and vulnerable groups using culturally appropriate communication channels and local languages
- EOIs that are viable proceed to full proposal development.

Step 2 – Full Proposal Screening & Risk Categorisation (EES)

EEs lead screening using CABRIC tools:

- CABRIC Environmental & Social Screening Form
- GEDSI assessment checklist
- National environmental compliance requirements
- SEAH and labour risk screening
- Stakeholder consultation evidence

Outputs include:

- Assignment of Category C (minimal risk) or Category B (moderate, site-specific risks)
- Identification of required mitigation instruments (EMMP/ESMP/IPP/FPIC)
- Confirmation of needed permits or clearances
- Category A projects are not eligible.
- Projects requiring the relocation or displacement of Indigenous Peoples from their communally held lands or natural resources; and that may significantly impact cultural heritage (including sacred sites and non-physical cultural expressions) or propose to use it for commercial purposes are not eligible.

Step 3 – Appraisal by National Grant Committees

National Grant Committees convened by each EE review:

- Technical feasibility
- Environmental and social risks
- Mitigation measures and EMMP/ESMP completeness
- Budgeting and inclusion of safeguards costs
- National compliance
- Review of the IPP and FPIC

Step 4 – Approval

- The National Boards hold the final oversight and approval authority. They review the recommendations to ensure strategic alignment and fair process, and they hold the sole authority to formally approve the sub-projects for contracting.

Step 5 – Contracting, Disclosure & Implementation

Upon National Boards Approval clearance:

EEs contract grantees and integrate safeguards requirements into agreements.

- Risk and mitigation summaries are disclosed locally.

EEs monitor compliance; PMU conducts periodic oversight.

7.4 Exclusion list

CABRIC will not support:

- Category A activities
- Significant adverse impacts on critical habitats
- Activities requiring full EIA under national legislation
- Major civil works, infrastructure, or land acquisition
- Involuntary resettlement and or displacement
- Introduction of invasive species
- Hazardous waste generation beyond local capacityActivities with significant SEAH, child labour, or forced labour risksActivities with negative impact on indigenous communities

Activities requiring FPIC, where consent has been withheld or withdrawn

7.5 Required safeguards documentation

Each approved project must include:[4]

- Completed E&S Screening Form
- Risk category (C or B)
- EMMP or ESMP (for Category B projects)
- Site-specific IPP
- Stakeholder engagement evidence
- GRM disclosure materials
- National permits (when required)

Signed grant agreement with safeguards clauses

[4] A sub-project Gender Action Plan is a mandatory universal requirement for all full proposals, whereas the IPP, LRP, and CHMP are conditional requirements triggered only if the screening tool identifies potential impacts.

8. Stakeholder engagement

Stakeholder engagement played a pivotal role in the formulation of the CABRIC programme. Recognizing that climate change and gender inequality are deeply interconnected challenges, the CABRIC team prioritised inclusive and participatory approaches to ensure the programme's design accurately reflects the diverse social, environmental, and economic contexts of the five target countries.

Meaningful engagement was integral to understanding the differentiated needs, vulnerabilities, and capacities of women, men, youth, Indigenous Peoples, and other marginalized groups within coastal communities. The stakeholder engagement process aimed to capture lived experiences, highlight systemic barriers, and co-develop solutions to enhance gender equality and climate resilience across the region.

Under Component 2, specific proactive measures include partnering directly with traditional authorities (the Toledo Alcaldes Association or the National Garifuna Council) to ring-fence specific outreach activities and ensure IPOs are well-positioned to access the Grant Facility.

8.1 Stakeholder engagement process

The stakeholder engagement process for CABRIC was carried out through a combination of desk-based research, key informant interviews (KIIs), and national multi-stakeholder workshops. These approaches were designed to ensure broad representation and to incorporate both technical and community-level insights into the project's design.

An extensive literature review was conducted prior to field engagement to identify existing gender dynamics, social inclusion challenges, and climate resilience capacities in each target country. This foundational research informed the development of tailored stakeholder engagement strategies and the creation of a semi-structured interview instrument (see Appendix 4) to guide discussions with key actors.

Primary data collection was conducted through semi-structured KIIs with representatives from:

- National Designated Authorities (NDAs)
- Government ministries (focused on gender, environment, and finance)
- Civil society organizations (CSOs), including women's rights groups, Indigenous Peoples' organizations, and disability advocacy groups
- Private sector actors in agriculture, fisheries, and tourism
- Academia and research institutions

8.1.1 Stakeholder consultations

The final design of the CABRIC grant facility was directly responsive to local input gathered across all consultation phases (December 2024 through May 2026). Here, in-person and virtual Key Informant Interviews (KIIs), Group Interviews/Focus Groups, structured workshops, and online surveys were conducted. Key integrations include:

- **Tiered Grant Facility & Capacity Building:** Feedback from local organizations highlighted the difficulty of accessing climate finance due to donor compliance rules. In response, a tiered sub-grant facility (Small, Medium, Large) was created with simplified access pathways and targeted capacity-building initiatives for grassroots actors.
- **Local Authority & NGO Eligibility:** December 2025 validation feedback led to explicitly adding Local Authorities (LAs) as eligible grantees alongside NGOs and CSOs, while establishing strict eligibility criteria to prevent large international organizations from "crowding out" smaller national entities.
- **Implementation Adjustments:** January – March 2025, based on direct NDA feedback, the Bahamas Grant Administrator was shifted from the UNDP to the Bahamas National Trust to better align with local contexts.
    - **Local Language GRMs:** Consultations highlighted strict language barriers, leading to the mandate that Grievance Redress Mechanisms (GRMs) must be accessible in local languages, including Garifuna, Mayan, Sranan Tongo, and Kwéyòl.
    - **Culturally Appropriate FPIC:** Feedback from Indigenous stakeholders emphasizing mutual respect and traditional leadership led to the integration of tailored Free, Prior, and Informed Consent (FPIC) protocols aligned with specific community governance systems (e.g., the Maya Alcalde system and the National Garifuna Council).

- **Locally Prioritized Interventions:** Grassroots input from May 2026 consultations led to the explicit prioritization of upgrading multi-purpose hurricane shelters, improving food/water security, and protecting fisheries livelihoods.
- **Grassroots Delivery Partners:** May 2026, to avoid "one-size-fits-all" approaches, the programme actively mapped and designated specific local organizations on the ground, such as San Salvador Living Jewels, to serve as vital delivery partners for locally led adaptation grants.

9. Grievance Redress Mechanism (GRM)

The CCCCC-GRM, through its Oversight and Project-level System, supervises project-level GRMs to ensure their compliance and are resolved by the GRM Committee. This system is designed to handle complaints related to project-level grievance mechanisms such as disagreements with how a case was resolved; allegations of bias; and fears of reprisal for using the Project Level GRM.

9.1 Project-level Grievance Redress Mechanism

To ensure transparency, accountability, and responsiveness, this Grievance Redress Mechanism (GRM) is established in compliance with the GCF requirements. The GRM provides a structured process for receiving, assessing, and addressing grievances related to the programme's implementation. The main objective is to ensure timely and effective resolution of grievances related to the programme; enhance stakeholder trust and programme accountability; and comply with the GCF's E&S, and Indigenous Peoples Policy, and the CCCCC's ESMS and Indigenous People Policy. The Project Level GRM aims to provide stakeholders with *"an accessible, transparent, efficient, and legitimate channel to address legitimate grievances from all stakeholders."*[i] These complains can surround environmental or social concerns, policies, gender issues, and safeguards related to the practices implemented by the grant administrator, CSOs, NGOs, LAs or other institution.

Examples of complains include, *inter alia*:

- Labour and working conditions
- Pollution of land, water and atmosphere
- Inefficient use of natural resources
- Issues related to health, safety and security
- Reporting on issues related to Sexual Exploitation, Abuse, Harassment (SEAH)- (*Reporting and recourse outlined separately below)*
- Lack of community consultations or integration of community feedback

Lack of impartiality, and fairness in grant award process

challenge of grant award, grant management, or underperformance decision

- Allegations of conflict of interest by Grant Administrator Personnel
- Breach of CCCCC's policies and procedures
- Negative impacts on indigenous communities, improper consultation with indigenous communities, violations of FPIC
- Social or economic displacement / impacts on informal land occupants.

Grievance Submission Channels

Affected persons may submit grievances through the following channels:

Online Portal: A dedicated grievance submission form available on the **CABRIC Website and Accountability Portal with QR Code link to App.**

- **Email**: Direct submission to the **GRM focal point within the RPCU.**
- **Phone Hotline**: A toll-free number for immediate concerns. This will be determined once paid for during project implementation.
- **In-person Submission**: At designated CABRIC Programme offices or CCCCC headquarters.
- **Community Liaison Officers**: Assigned officers available in programme regions to collect grievances- given the multi-country nature of CABRIC, it is important for aggrieved parties to have access to the GRM in their respective countries. CLOs will be sensitized on mandatorily logging grievances and supporting the GRM.

Grievances can be submitted in English, Spanish, French, or the local language of the affected communities such as Mayan, Garifuna, kweyol. Anonymous grievances will also be accepted in line with CCCCCGRM Manual and addressed.

A flow chart and refined GRM process will be elaborated during project inception and following consultations with all Grant Administrators, CCCCC and the RPCU.

Grievance Submission Channels

Affected persons may submit grievances through the following channels:

- **Online Portal**: A dedicated grievance submission form available on the **CABRIC Website with QR Code link to App.**
- **Email**: Direct submission to the **GRM focal point within the RPCU.**

- **Phone Hotline**: A toll-free number for immediate concerns. This will be determined once paid for during project implementation.
- **In-person Submission**: At designated CABRIC Programme offices or CCCCC headquarters.
- **Community Liaison Officers**: Assigned officers available in programme regions to collect grievances- given the multi-country nature of CABRIC, it is important for aggrieved parties to have access to the GRM in their respective countries. CLOs will be sensitized on mandatorily logging grievances and supporting the GRM.

Grievances can be submitted in English, Spanish, French, or the local language of the affected communities such as Mayan, Garifuna, kweyol. Anonymous grievances will also be accepted in line with CCCCCGRM Manual and addressed.

A flow chart and refined GRM process will be elaborated during project inception and following consultations with all Grant Administrators, CCCCC and the RPCU.

GCF Independent Redress Mechanism (IRM)

Aggrieved parties can also access the GCF IRM. The IRM addresses complaints by people who believe they are negatively affected or may be affected by projects or programmes funded by the GCF. The IRM is not a last recourse mechanism. Therefore, a complainant may opt to report directly to the IRM.

The GCF IRM can be accessed through:

- Email: irm@gcfund.org
- Sending a voice or video recording
- Filling out the online complaints form

Grievance Handling Process

The GRM follows a structured **four-step process**:

Step 1: Acknowledgment and Registration (Within 5 Working Days)

a) The grievance is logged into the **GRM database.**
b) The complainant receives an acknowledgment receipt with a tracking number.
c) Initial screening is conducted to determine eligibility and categorization.

Step 2: Assessment and Resolution Proposal (Within 20 Working Days)

a) The **GRM Committee,** composed of representatives from the RPCU ,nationally identified committee members, and independent experts if necessary, assesses the grievance.
b) If needed, the complainant is consulted for additional details.
c) A proposed resolution is drafted and shared with the complainant for feedback.

Step 3: Implementation of Resolution (Within 30 Working Days of Agreement)

a) If the complainant accepts the resolution, corrective actions are implemented.
b) The complainant is informed of progress and final resolution steps.
c) If the complainant rejects the resolution, they may escalate the grievance.

Step 4: Appeal and Independent Review (Within 45 Working Days)

a) If the complainant is unsatisfied, the case is referred to the CCCCC**.**

The CCCCC reviews the case and provides a final resolution.

The complainant may at any time in the process, escalate the issue to the **GCF Independent Redress Mechanism (IRM).**

The GRM is to be linked to a Code of Conduct which makes it clear that some of the Conduct could be reported under the GRM.

Confidentiality and Non-Retaliation

All grievances will be treated **confidentially,** ensuring protection of complainants' identities. CCCCC prohibits any form of retaliation against complainants. Anonymous complaints will be addressed with the same diligence as named complaints.

Monitoring and Reporting

The CABRIC Environmental and Social Specialist will be responsible for maintaining a comprehensive grievance log that records all complaints received, along with details of their assessment, processing, and resolution. This log will capture essential information, such as the date of receipt, the nature of the grievance, the parties involved, actions taken, current status, and the final outcome. To ensure transparency and accountability, the log will be regularly updated and securely stored in both physical and digital formats, accessible to authorized personnel only.

In line with GCF compliance requirements, the Environmental and Social Specialist under the guidance of the GRM Committee will compile and submit regular grievance reports to the GCF Secretariat, typically on a quarterly and annual basis, or as otherwise requested. These reports will provide an overview of grievances received, trends or recurring issues, response times, resolutions

achieved, and any lessons learned or corrective actions implemented to improve grievance handling processes. With regards to gender-based violence and SEAH, a separate and complementary mechanism and a separate trained committee that investigates such cases will be established. The SEAH reporting process is detailed below.

Additionally, to promote public confidence and demonstrate the program's commitment to accountability, the GRM will ensure that an annual summary of non-confidential grievance outcomes is published on the CABRICwebsite. This disclosure will include anonymized information on the types of grievances submitted, how they were addressed, and any systemic improvements made as a result. The public disclosure will adhere to data protection and privacy principles, ensuring that no personal or sensitive information is shared.

Awareness and Accessibility

To ensure that all stakeholders are fully informed about the existence, purpose, and procedures of the GRM, a comprehensive communication strategy will be implemented. GRM information will be widely disseminated through multiple, culturally appropriate channels, including community meetings, through CABRIC CLO engagement with communities, radio broadcasts, and printed materials such as brochures, posters, and leaflets. All materials and announcements will be prepared in the local languages spoken within project areas to ensure clarity and understanding across diverse communities. Community meetings will serve as interactive platforms where participants can ask questions, seek clarification, and provide feedback on the grievance process. Radio broadcasts will help reach remote or rural populations, delivering key information on how, where, and when grievances can be submitted, using simple and clear language. Printed materials will be displayed in high-traffic community locations, such as markets, schools, health centres, village notice boards and Grant Administrator Offices.

Recognizing that certain groups may face barriers in accessing grievance mechanisms, special provisions will be made to guarantee that vulnerable and marginalized populations are included. This includes indigenous peoples, women, persons with disabilities, the elderly, and youth. Specific strategies to enhance accessibility may include:

- Organizing separate information sessions for women, indigenous groups, or persons with disabilities to ensure they feel comfortable expressing concerns in culturally sensitive environments.
- Providing sign language interpretation, braille materials, and other assistive formats as needed to accommodate persons with hearing, visual, or physical impairments.
- Deploying community liaison officers who are trained in gender sensitivity and social inclusion to assist vulnerable groups with filing grievances.
- Establishing mobile grievance collection points and using local focal points in remote areas to reduce travel burdens for those living far from administrative centres.
- Ensuring that grievance submission processes are free of charge and can be submitted verbally, in writing, or through trusted community representatives to accommodate varying literacy levels and language proficiencies.

9.1.1 Dedicated SEAH channel

This dedicated SEAH channel will operate alongside and work independently from the standard four-step process as highlighted in the Grievance Handling Process section above. This SEAH channel will bypass local community leaders and any party potentially implicated in a complaint. See the SEAH submission channel below:

SEAH Submission Channels

Affected persons may submit grievances through the following channels:

- **Online Portal**: A dedicated SEAH grievance submission form available on the **CABRIC website.**
- **Email**: Direct submission to the **GEDSI Specialist at the RPCU** (this will be different from the general GRM email contact).
- **Phone Hotline**: A toll-free number for immediate concerns regarding SEAH to the **GEDSI Specialist**(this will be different to the general GRM contact).
- **In-person Submission**: In-person grievances to be relayed to the **GEDSI Speicliast at CCCCC**
- ***Submissions can be made directly to the GCF's Independent Integrity Unit where required.***

Given the range of potential grievances and levels of seriousness of allegations, a survivor-centred protocol will is established. Hence, a one-size-fits-all model will not be considered suitable. The protocol is listed below:

a) **Referral pathways:** The survivor must be offered access to medical, psychosocial, legal and protection aid and support within 24-72 hours.
b) **Consent of the survivor** must be sought before sharing any information with investigators, project management or the GCF Secretariat. The survivor can choose to withdraw from the process at any time.
c) **An immediate risk assessment** is to be conducted to determine if the survivor is in physical danger or at risk of retaliation from the perpetrator.

d) **Investigation:** Using non-judgemental language, interviews are conducted **once** by the GEDSI Speiclist. This is to avoid re-traumatisation.
e) If the allegation is substantiated, the protocol then triggers **administrative actions** such as termination of employment (for the perpetrator) or recovery of funds. Additionally, law enforcement remedies may be triggered by consulting law enforcement authorities, in accordance to national laws.Appeals can be directed to the CCCCCC
f)

Any SEAH related grievances will be taken will the utmost empathy and sensitivity. In all cases, the GEDSI Speicialist will be bound by tightly confidentiality requirements.

To ensure consistency, the SEAH channel will be aligned with the SEAH Code of Conduct, housed within the GRM as the central reporting mechanism. This referral pathway will be refined at project inception in line with the planned refinement of the Project level GRM.

9.2 CCCCC's Grievance Redress Mechanism

The CCCCC website contains a complaints section that focuses on their Grievance Redress Mechanism (GRM) which allows for stakeholders to submit complaints as well as issues relating to projects that the CCCCC is directly / indirectly involved in as a funding, accrediting, and/or implementing entity. Its aim is to provide stakeholders with *"an accessible, transparent, efficient, and legitimate channel to address legitimate grievances from all stakeholders."*[ii] These complains can surround environmental or social concerns, policies, gender issues, and safeguards related to the practices implemented by an institution.

Further examples of complains include:

- Labour and working conditions
- Pollution of land, water and atmosphere
- Inefficient use of natural resources
- Issues related to health, safety and security
- Reporting on issues related to Sexual Exploitation, Abuse, Harassment (SEAH)
- Human Resources, Lack of compliance with Environmental and Social Management Safeguards.
- Grievances on project-level GRM review of case resolution, lack of impartiality, and/or fear of retaliation among project-level GRMs.
- Alleged conflict of interests by CCCCC's personnel
- Breach of CCCCC's policies and procedures
- Social or economic displacement / impacts on informal land occupants.

There are various entry points to submit complains to CCCCC (Figure 14): online; phone; and in-person. Whilst in some cases, complaints can be anonymous, the CCCCC requires the stakeholder to leave at least one contact detail in order to follow up on the specific issue.

Figure 1 Entry points to submit complaints

With regards to the 9 principals of CCCCC-GRM, these are:

- Legitimate: this enables trust
- Accessible: it is known to all stakeholders
- Predictable: a clear procedure
- Efficient: a straight-forward procedure
- Equitable: reasonable access to information regarding the grievance process.
- Transparent: informs stakeholders of the complaint process
- Rights-compatible: respect international human rights laws
- A source of continuous learning draws on lessons learned to enhance mechanism
- Based on engagement and dialogue: consults stakeholders to address issue.

In alignment with CCCCC's gender policy, Principle 5 outlines procedures for handling complaints related to gender-based violence and sexual harassment. The GRM proactively addresses Sexual Exploitation, Abuse, and Harassment (SEAH) by employing a gender-sensitive framework. This prevents biased stereotypes and social norms from obstructing women and men's ability to fully exercise their rights and reap the benefits of the Centre's initiatives.

The three stages of the GRM are shown in Figure 2 whilst the process breakdown of a grievance report is highlighted in Figure 3. In cases related to **Section IX of CCCCC's Policy on the Protection of Whistleblowers and Against Retaliation** or **Section VI of CCCCC's Anti-Fraud and Corruption Policy**, these are classified as category 3. The CCCCC's Policy on the Protection of Whistleblowers and Against Retaliation also features Section V Protection; VI Types of Retaliation; Section VII Duty to Report; VIII Anonymous Reporting; Section X Remedies and Discipline; and Section XI Policy Administration and Revision. It is important to note that the CCCCC GRM does not impede access to national or local judicial or administrative remedies.

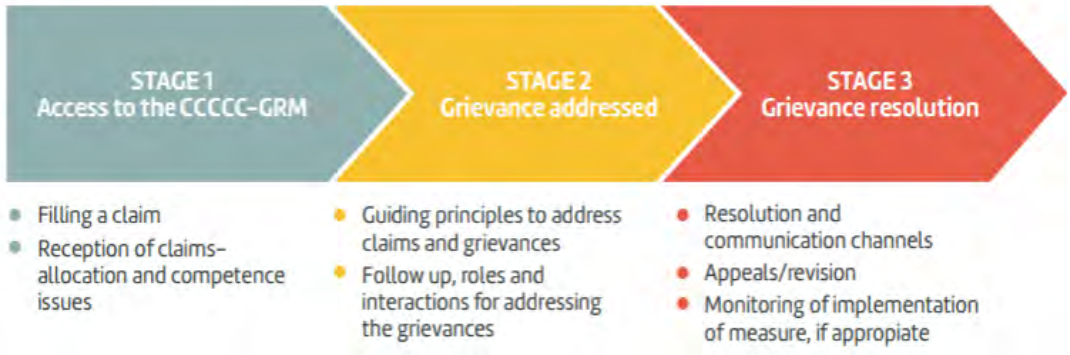


Figure 2 Three stages of the CCCCC GRM

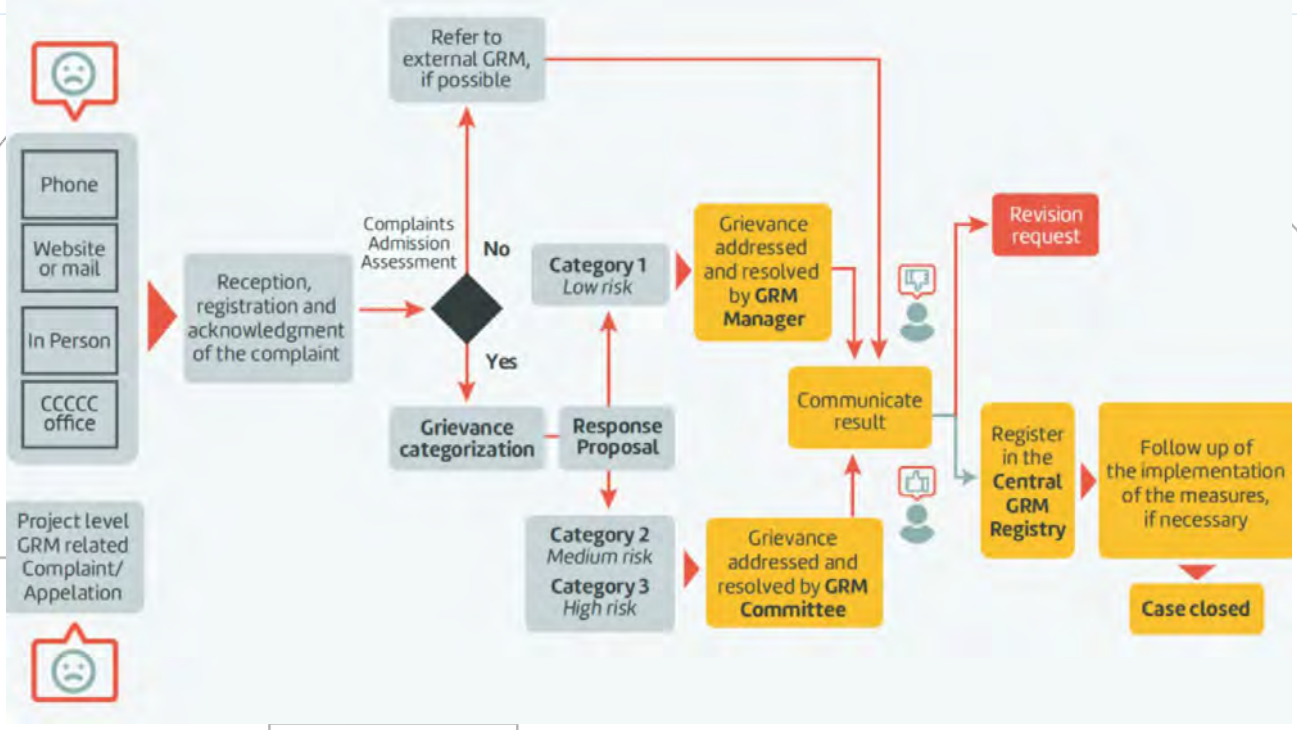


Figure 3 CCCCC grievance report process breakdown

9.3 Community-level Grievance Redress Mechanism

As mentioned above, FPIC dictates that indigenous peoples' communities must autonomously decide matters affecting them, adhering to their legal frameworks, cultural traditions, and practices. The circumstances that require FPIC are: impacts on lands and natural resources subject to traditional ownership or under customary use; relocation of indigenous peoples from lands and natural resources subject to traditional ownership or under customary use; and critical cultural heritage.[iii] For the different communities to access the GRM, it needs to be ensured via multiple channels, and should be established from the inception.

9.4 Management of Environmental and Social Issues

All Environmental and Social issues shall be separately logged in the **Environmental and Social Issues Register**. Receipt of the issue or grievance shall be formally acknowledged to the complainant (where applicable) within a defined timeframe as outlined in Section 9.1. These issues shall be first check against the predetermined risk list established at the project development stage to determine if the mitigation measures recommended are sufficient.

10. Monitoring and evaluation

Monitoring of the ESMF will be carried out through a multi-tiered system that includes internal monitoring by implementing entities, third-party audits, and community-based participatory monitoring.

The primary objectives of the monitoring system are:

- To ensure compliance with the Environmental and Social Action Plan (ESAP);
- To track performance against key environmental and social indicators;
- To identify emerging risks and implement adaptive management measures;
- To ensure stakeholder engagement and transparency throughout the project cycle.

10.1 Roles and responsibilities

the Regional Programme Coordination Unit (RPCU)

- Leads the overall implementation and enforcement of the ESMF.
- Ensures periodic reporting to the Caribbean Community Climate Change Centre (CCCCC) and the GCF.
- Integrates findings from audits, assessments, and stakeholder feedback into project adaptations.

Grant administrators

- Oversee project compliance at the national level.
- Ensure alignment with local environmental and social policies.
- Report environmental and social performance data to the PMU.

Environmental and Social Safeguards (ESS) officer (PMU and grant administrators)

- Conduct regular site visits and monitor compliance with safeguard measures.
- Identify risks and propose corrective actions.
- Serve as the primary liaison for community engagement and grievance mechanisms.

10.2 Evaluation mechanisms

Evaluation of the ESMF implementation will occur at regular intervals to assess overall programme performance, determine the effectiveness of mitigation measures, and ensure continuous improvement. Key evaluation activities include:

Periodic Review and Performance Assessments

- **Quarterly Progress Reports**: Submitted by NIEs to the PMU, summarising compliance status and any environmental or social challenges encountered.
- **Annual Compliance Reports**: Independent auditors will prepare reports detailing findings from environmental and social compliance audits.
- **Mid-term and Final Evaluations**: Conducted to assess programme impact and recommend strategic improvements.

Community-Based Monitoring and Feedback

- Establishment of participatory monitoring mechanisms involving local communities.
- Regular stakeholder meetings to gather feedback and address concerns.
- Integration of traditional knowledge and local expertise into monitoring approaches.

Adaptive Management and Corrective Actions

- Identification of gaps and challenges in implementation.
- Development of action plans for corrective measures.
- Realignment of project activities to address unforeseen environmental or social risks.

10.3 Reporting framework

The reporting system is designed to ensure transparency, accountability, and accessibility of monitoring data. Reporting formats will be standardised and include:

- **Monthly Internal Reports** by grant administrators and ESS officer detailing compliance with mitigation measures.

- **Quarterly Progress Reports** submitted to CCCCC and relevant national authorities.
- **Annual Safeguard Compliance Reports** prepared by independent auditors for submission to the GCF.
- **Public Disclosure Reports** summarizing key findings and making them available to stakeholders via project websites and community meetings.

11. Information disclosure

This chapter outlines the information disclosure requirements for the ESMF of the CABRIC project in alignment with the GCF Information Disclosure Policy. The policy ensures transparency and stakeholder engagement by making environmental and social documents available to the public in a timely manner.

As the CABRIC programme has been classified as Category B, disclosure of the ESMF must occur at least 30 days prior to the decision of either the CCCCC, the Accredited Entity for this project, or the GCF's Board, whichever is earlier. This ensures that affected communities, stakeholders, and the general public have adequate time to review and provide feedback on the proposed measures to mitigate environmental and social risks.

The disclosure will include the Environmental and Social Management Framework and all relevant annexes, including mitigation, monitoring, and capacity-building plans. Additionally, the Stakeholder Engagement Plan and details on the Grievance Redress Mechanism will be made publicly available. Any updates or addenda to the ESMF, based on stakeholder feedback, will also be disclosed to maintain transparency and inclusivity.

To facilitate broad accessibility and inclusivity, the disclosed documents will be made available in both English and Spanish. Where necessary, additional language translations may be provided to accommodate key stakeholders within the project-affected areas. Ensuring that all relevant parties have access to these documents in a language they understand is essential for meaningful participation in the project.

The ESMF and related documents will be disclosed through multiple channels. These include publication on the GCF's official website under the project's designated page and on the website of CCCCC. Additionally, where applicable, the documents will be made accessible through national and local government portals. Hard copies will be placed in public institutions such as municipal offices, community centres, and libraries in areas directly affected by the project. Stakeholder engagement meetings will also serve as key platforms for presenting and discussing the ESMF and its annexes with civil society organizations and other relevant stakeholders.

Stakeholders will have multiple avenues to submit feedback, concerns, and recommendations. These include email submissions to CCCCC and the project implementation unit, dedicated online portals or feedback forms on the project website, in-person consultations and public meetings, and written submissions through designated offices in project-affected areas. Ensuring a robust feedback mechanism allows for meaningful engagement and consideration of stakeholder perspectives.

The project implementation team will actively track and report on the effectiveness of information disclosure efforts. Stakeholder feedback will be documented and appropriately considered in the finalization of the ESMF. A summary of the disclosure process, including stakeholder comments and responses, will be included in the project's periodic reporting to the GCF, ensuring accountability and continuous improvement in transparency measures.

The CABRIC project is committed to transparency and inclusive stakeholder engagement through proactive information disclosure. By ensuring timely access to key environmental and social documents, the project aims to foster trust, accountability, and meaningful participation from all relevant stakeholders. The disclosure of environmental and social documents is a fundamental step in ensuring informed decision-making and sustainable project implementation.

Appendix I: Biodiversity Impact Screening Checklist

Purpose
This screening form is to be completed during the environmental and social screening of all subprojects under Component 2 of the project. It supports identification of potential overlap with critical habitats and the need for enhanced biodiversity assessments or mitigation. It aligns with IFC PS6, CCCCC Environmental and Social Management System.

Section A: Subproject Information

Item	Details
Subproject Name	
Location (Region, Prefecture, Coordinates)	
Type of Activity	
Size and Footprint (ha)	
Anticipated Start Date	
Implementing Partner	

Section B: Screening Criteria
Complete the checklist below to assess whether the subproject may overlap with or impact critical habitat.

Screening Question	Yes/No	Notes / Evidence Source
1. Is the site within or adjacent to a legally designated protected area?		
2. Is the site located within a Key Biodiversity Area (KBA) or Important Bird Area (IBA)?		Refer to BirdLife/KBA datasets
3. Does the area support species listed as Critically Endangered or Endangered on the IUCN Red List?		Highlight known species in Section C
4. Does the area contain endemic, range-restricted, or migratory species populations?		
5. Are there critical seasonal use areas (e.g., breeding, nesting, foraging, migratory stopovers)?		
6. Is the project site in or near known ecological corridors or intact natural habitat patches?		
7. Will vegetation clearing or construction occur during breeding or nesting season?		(Indicate timing and mitigation planned)

If Yes is selected for any of the above, proceed with Section C.

Section C: Species of Concern (Indicative List)
Based on ecological data and expert consultation
Critical ecosystems include:

- Coral species (e.g Acropora)
- Mangrove species (e.g the Red Mangrove (Rhizophora mangle), White Mangrove (Laguncularia racemosa), Black Mangrove (Avicennia germinans), and Buttonwood (Conocarpus erecta)
- Seagrasses and algae (e.g Avrainvillea, Udotea, Penicillus, Halimeda, Amphiroa, and Caulerpa)

Vital marine species include:

- Queen conch and spiny lobster
- Reef and pelagic fish (e.g snappers and groupers)
- Seaturtles

Section D: Preliminary Risk Classification

Critical Habitat Likelihood	Description

Low	No overlap with critical habitat or species of concern. Proceed with standard ESMP.
Moderate	Proximity to critical habitat or occasional presence of sensitive species. BMP required.
High	Direct overlap with critical habitat. Project CANNOT proceed.

Section E: Fauna Protection and Construction Timing Guidance

To minimize impacts on biodiversity, particularly sensitive fauna:

- Avoid vegetation clearing during peak nesting and breeding seasons (typically May–July in the Caribbean).
- Where possible, time noisy construction (e.g. drilling outside of migratory or calving periods.
- Conduct pre-construction surveys to flag nesting sites or animal burrows for temporary buffer zones.
- Use low-noise, non-invasive machinery where wildlife presence is confirmed.
- Train contractors and site supervisors on species identification and protection protocols.
- Implement a "Stop Work" protocol if protected fauna is observed on-site.

Section F: Safeguards Officer Review[5]

Item	Details
Name of Reviewing Officer	
Position / Institution	
Date of Review	
Recommendation	☑ No further action ☑ BMP required ☑ Redesign required
Signature	

This form should be attached to each subproject file and referenced in the ESMP, where applicable.

[5] GEDSI officer

Appendix II: Indicative Land Management Procedure

Introduction

These Labour Management Procedures (LMP) outline the approach for managing labour in compliance with IFC Performance Standard 2, the GCF Environmental and Social Policy, and CCCCC Environmental and Social Management System. They apply to all project workers—including direct, contracted, community, and primary supply workers—engaged under the CCCCC-GCF project.

The LMP is intended to guide contractors, implementing partner government stakeholders, and CCCCC field staff in ensuring decent work conditions, occupational safety, non-discrimination, and grievance redress for workers involved in coastal ecosystem and water resource management services.

Types of Project Workers

Worker Type	Description
Direct Workers	CCCCC staff and consultants hired for project implementation.
Contracted Workers	Staff hired by contractors, or implementing partners.
Community Workers	Individuals voluntarily mobilised by communities (e.g., for replanting)
Primary Supply Workers	Workers engaged by suppliers of materials or services.

Applicable Labour Standards

All project workers will be managed in accordance with the following:

- The Bahamas Employment Act (Chapter 321); the Belize Labor Act (Chapter 297); Grenada's Employment Act (No. 14); Jamaica's Labour Relations and Industrial Disputes Act; Saint Lucia's Labor Code (No. 37).
- IFC Performance Standard 2
- International Labour Organization (ILO) Conventions 138 & 182 (Child Labour)

Working Conditions and Terms of Employment

- All workers must be provided written contracts with clear terms of employment, job descriptions, wage rates, hours, and conditions.
- Working hours will not exceed national limits, and overtime must be voluntary and compensated.
- Workers shall receive equal pay for equal work, regardless of gender, ethnicity, or displacement status.
- Workers must be at least 18 years old, except for government-permitted apprenticeships (16–17) under supervision.

Occupational Health and Safety (OHS)

Contractors, implementing partners are responsible for ensuring:

- Use of Personal Protective Equipment (PPE) appropriate to work activities.
- Access to clean drinking water, sanitation, and rest breaks at work sites.
- Training on safe tool handling, machinery, and construction protocols.
- Immediate access to first aid and referral services for injuries.

All incidents must be reported using an OHS incident register and investigated within 72 hours.

Prevention of Child labour, forced labour and prevention of Safeguarding risks, inclusive of SEA and HS

Child labour is strictly prohibited. No worker under 18 shall be engaged in hazardous activities.

Forced or coerced labour of any form is forbidden.

All workers and supervisors must sign and comply with Codes of Conduct (CoC) addressing:

- Child protection;

- Sexual exploitation and abuse (SEA), and Sexual Harassment (SH);
- Non-discrimination and respectful workplace behaviour.

CCCCC SEAH protocol must be followed for all complaints and disclosures.

Roles and Responsibilities

Entity	Responsibilities
Contractors / NGOs	Implementation of LMP, provision of contracts, OHS, grievance redress.
Supervisors / Site Managers	Daily monitoring, toolbox talks, incident response, and worker awareness.
Labour Inspectors / Govt	Enforcement of national labour laws and site inspections.
Community Monitors	Informal reporting on labour conditions and compliance in community-based worksites.

Training and Capacity Building

- Pre-mobilization orientations will be provided for all contractors and labourers.
- Topics include:
  - Worker rights under the Bahamas Employment Act (Chapter 321); the Belize Labor Act (Chapter 297); Grenada's Employment Act (No. 14); Jamaica's Labour Relations and Industrial Disputes Act; Saint Lucia's Labor Code (No. 37).
  - OHS protocols and PPE usage
  - SEAH prevention and CoC
  - Grievance channels and whistleblower protections
- CCCCC and its partners will conduct semi-annual refresher sessions.

Monitoring and Reporting

- Labour indicators (e.g., number of workers, grievances, SEAH cases, OHS incidents) will be disaggregated by gender, age, and status (IDP, returnee, etc.)
- Site inspections will be conducted quarterly.
- Labour external reviews may be commissioned by CCCCC or the GCF at any time.

Appendix III: Chance Finds Procedure

c

Appendix IV: Environmental and Social Screening Tool

The Environmental and Social Screening Tool is the first step in ensuring that all projects financed under the CABRIC Programme are environmentally sound, socially inclusive, and fully aligned with GCF Environmental and Social Standards, the Updated Gender Policy, and CABRIC's own safeguards requirements. Under the decentralised operational structure, EEs (The Bahamas Protected Areas Fund, the Grenada Investment Development Corporation, Saint Lucia Development Bank, JSIF, and the Belize Fund) are responsible for leading the screening of all Expressions of Interest (EOIs) and full proposals within their national portfolios. This tool enables EEs to rapidly identify potential environmental or social risks, determine eligibility, and recommend the level of safeguards documentation required.

Screening should be undertaken as early as possible—preferably during initial proposal development—in collaboration with Country Facilitators and local proponents. The tool evaluates eligibility, environmental sensitivities, anticipated impacts, labour and OHS considerations, gender and disability inclusion, and SEA/SH risks. Findings from the screening process guide whether a project can proceed as Category C (low risk), Category B (moderate risk requiring an ESMP/EMMP), or whether it falls outside CABRIC's allowable scope. The PMU Safeguards Lead conducts a quality assurance review of all screenings, ensuring consistency across countries and alignment with programme-level safeguards commitments.

Section 1 – Administrative Information

Item	Details
Country:	
Project Title:	
Grantee / Proponent:	
Executing Entity (	
Location of Activities: (community, district, GPS if available)	
Reviewer Name & Position:	
Date of Screening:	

Section 2 – Eligibility Check (Go/No-Go)

Answer all questions. If ANY are "Yes", the proposal is *ineligible* for CABRIC financing.

No.	Screening Question	Yes/No	Notes
1	Does the activity involve involuntary resettlement, land acquisition, or physical displacement?		
2	Will the activity restrict access to natural resources or livelihoods (e.g., fishing, farming, forest use) without providing adequate compensation or alternative livelihood support?		
3	Does the activity include any form of new infrastructure construction exceeding CABRIC's mandate (e.g., large dams, major roadworks)?		
4	Does the activity involve the construction of new facilities on previously undeveloped land (i.e., a new footprint)?		
5	Does the activity involve procurement or use of prohibited pesticides or hazardous chemicals?		
6	Will the activity occur within legally protected areas where national regulations prohibit intervention?		
7	Does the project involve Genetically Modified Organisms (GMO); Abortion Clinics; Nuclear Energy; etc. Wildlife or wildlife products regulated under Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).		
8	Does the activity involve high-risk activities requiring Category A/I-1 classification?		

If any question is "Yes", STOP – refer back to PMU for guidance. If all are "No", continue to Section 3.

Section 3 – Environmental Screening

3.1 Environmental Sensitivity of Site

Question	Yes/No	Notes
Is the activity located near rivers, wetlands, mangroves, or other water bodies?		
Will the activity affect slopes, erosion-prone soils, or landslide-risk zones?		
Is the site within or near critical habitats, key biodiversity areas, or wildlife corridors?		
Could activities generate waste, pollution, or sediment run-off?		
Could activities affect water quality (turbidity, contamination, debris)?		
Are there risks related to climate hazards (flooding, storms, drought)?		

3.2 Expected Environmental Impacts

Rate each as **Low / Moderate / High**

(High scores may trigger exclusion)

Impact Area	Rating	Notes
Soil disturbance, erosion		
Habitat disturbance or removal		
Water abstraction / pressure on water sources		
Solid/liquid waste generation		
Use of machinery / noise / vibrations		
GHG emissions or energy use		
Pollution risks (chemicals, runoff)		

Section 4 – Social Screening

4.1 Community Context

Question	Yes/No	Notes
Will the activity require community permissions or use of communal resources?		
Could the activity create or worsen conflicts between land/resource user groups?		
Are vulnerable groups present (women-headed households, persons with disabilities, youth, elderly)?		
Are Indigenous Peoples or Traditional Knowledge holders involved?		
Are language barriers or accessibility constraints expected?		
Will traditional knowledge be utilised?		
Is there a potential for consent withdrawal?		
Would there be reliance on traditional community governance?		
Is the project area located or in proximity of Indigenous Peoples territories? Will indigenous people be impacted?		

4.2 Labour & OHS Risks

Question	Yes/No	Notes
Will the project involve hiring workers or volunteers?		
Are OHS risks present (excavation, manual labour, equipment use)?		
Are community health & safety risks anticipated?		
Are contractors/Grantees required to follow OHS standards?		

Section 5 – Gender Equality, Disability & Social Inclusion (GEDSI)

Question	Yes/No	Notes
Has the proponent identified how different groups may benefit differently?		
Could the activity unintentionally exclude women, youth, older persons, or people with disabilities?		
Have measures been proposed to ensure equitable participation?		
Are separate focus groups or culturally appropriate approaches required?		

Section 6 – SEA/SH (Sexual Exploitation, Abuse & Harassment) Screening

Question	Yes/No	Notes
Will project staff or contractors interact directly with community members?		
Are activities in remote locations with limited oversight?		
Does the proponent demonstrate ability to manage SEAH risks?		
Is the activity targeted at vulnerable groups (women, youths), increasing SEAH sensitivity?		
Has the proponent acknowledged the CABRIC SEAH Protocol?		

If **any "Yes"**, SEAH mitigation actions must be included in the ESMP/EMMP.

Section 7 – Grievance Redress Mechanism (GRM)

Question	Yes/No	Notes
Has the proponent been informed of the CABRIC GRM requirements?		
Does the proponent commit to disclosing the GRM at community level?		
Are arrangements in place to handle complaints confidentially?		

Section 8 – Summary Risk Categorisation

Based on screening results, the project is:

- *(Screeners, select one)*

Category	Description
Category C (Low Risk)	Minimal environmental or social risks. Simple mitigation measures suffice.
Category B (Moderate Risk)	Requires a site-specific **ESMP/EMMP** or targeted mitigation plan.
Not Eligible	Activity involves high-risk elements or violates exclusion criteria.

Provide justification:

Summary of Key Risks Identified:
(short narrative)

Recommended Safeguards Instrument:
☐ No further action required
☐ Environmental & Social Management Plan (ESMP)
☐ Environmental & Social Management Measures Plan (EMMP)
☐ Additional targeted assessments (SEAH, OHS, water safety, biodiversity)
☐ Indigenous Peoples Plan
☐ Free, Prior, Informed Consent

Section 9 – Review & Approval

Role	Name	Signature	Date
EES Safeguards Officer			
Country Facilitator (Verification)			
PMU Safeguards Lead (Quality Assurance)			

Appendix V: Draft recommended EMMP tool

The following template and adapted text is also put forward for consideration for possible completion/ adaptation (for any shortlisted project identified in the above initial screening process "tool" before it is agreed to be implemented using GCF (EDA) funds. This is adapted from the USAID template tool used to screen projects submitted under the EDA. *(Adapted from the Environmental Mitigation and Monitoring Plan (Reg.216) "Guidelines for Implementing Partners USAID/Latin American and Caribbean Bureau (LAC) ENVIRONMENTAL MITIGATION and MONITORING PLAN (EMMP) - November 19, 2015)".*

Background

One recommendation for CCCCC to consider, as part of this programme, is to mirror an approach adopted by USAID whereby any funded activity need to be issued an "Environmental Threshold Decision (ETD)" or similar by CCCCC to a national entity applying for funding. One category of Threshold Decision is given to projects that are not found "to have a significant effect on the environment" when certain conditions are in place. The development of an Environmental Mitigation and Monitoring Plan (EMMP) is often one of the conditions set forth in the Negative Determination with Conditions (NDWC) ETD. The EMMP identifies any mitigating environmental effects of USAID activities and needs to meet any other conditions specified in the applicable ETD. It is also used for any sub-award pilot projects where the specific actions of sub-award are not yet identified at the time of award. The proposed EMMP form can include a Mitigation and Monitoring Plan for Environmental Assessments (EA).

Activities carried out by Executing Entities (EES) of the programme can include a range of discrete pilot projects under various awards that will likely have a risk for significant environment effects. The proposed EMMP procedure will provide CCCCC with both the screening for environmental risk and the preparation of a mitigation plan and reporting on monitoring of these mitigation measures associated with any grant funded pilot project application (Component 2). Gender and persons with disabilities are also considered as social impact factors in the development of a mitigation plan as these have a direct bearing on the type and kind of mitigation measure to be prescribed.

The EMMP should categorize pilot projects into three risk categories as follows:

- No Risk,
- Medium Risk, and
- High Risk.

Those with No Risk should continue without further review upon completion of the screening form (see above) and review and approval of the risk analysis by the Project Coordinator for CCCCC. The EMMP typically deals with those pilot projects at Medium Risk. Those with High Risk must be reconsidered for the need of an EA.

Most awardees that receive a Negative Determination with Conditions ETD will be required to fill out an Environmental Mitigation and Monitoring Plan (as attached) per pilot project type that includes:

- Narrative (Justification/Background, Baseline Information/Existing Conditions, Description of Activities, and Social Considerations sections must be completed at a minimum).
- The Environmental Screening Form (see above to assure the pilot project is at the Medium Risk Level
- The Environmental Mitigation Plan (Table 2) designed to identify potential impacts and related mitigation measures for each subcomponent of the pilot project.
- The Environmental Monitoring Table (Table 3) includes the necessary mitigation measures to be monitored, the monitoring indicators, who will conduct the monitoring, and when will the monitoring occur. Table A3 also includes a monitoring chart that documents who conducted the monitoring and the effectiveness of the mitigation measures.

Initial EMMP

1. Classification of Level of Risk

Different pilot projects under an award can have varying levels of risk for environmental effects and therefore require different courses of action. No-risk pilot projects, classified under "a" below, do not require the development of an Environmental Mitigation Plan (Table 5) or an Environmental Monitoring Table (Table 6). Pilot projects identified as Medium-risk ("b") require the EE to screen those potential environmental effects and develop a plan to mitigate them. High-risk pilot projects ("c") include pilot projects that have irrevocable change and/or cannot be mitigated by the implementation of industry standards, best management practices, or design specific implementation standards.

The figure below depicts schematic of required action based on the level of risk of a particular pilot project under an award. Note: all EDA pilot project pilot projects are required to have an EMMP completed. If all questions on Table A1 are checked as "No", then

the sub-award pilot project falls under the low risk category and implementation could start directly without further analysis, pending approval of the work plan by the CCCCC and the National Project Coordinator (NPC) for the specific country.

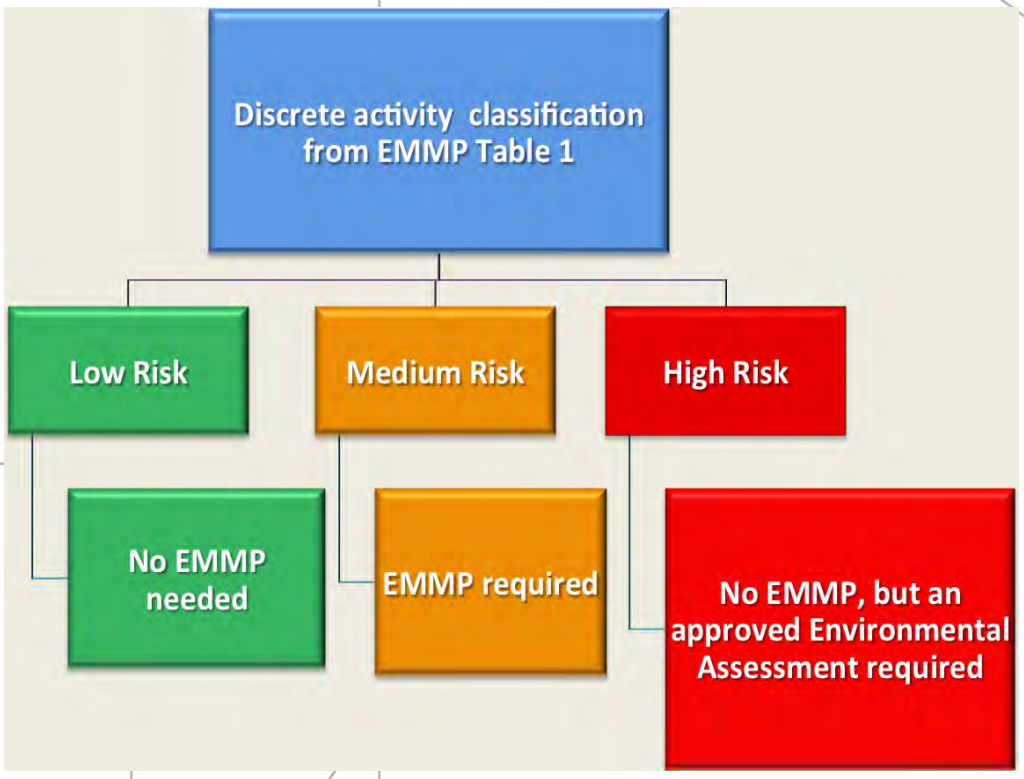


Figure 4 Required action based on the level of risk of a particular short-listed pilot project application

a) EDA Pilot Projects that do not require mitigation plans (No-Risk):
An illustrative list of no-risk discrete pilot project where no mitigation reporting is required includes:

- Education or training, unless it implements or leads to implementation of actions that impacts the environment (such as construction of schools or use of pesticides);
- Community awareness initiatives;
- Controlled research/demonstration activities in a small area;
- Technical studies or assistance (unless actions include agriculture and pesticides);
- Information transfers.

If there is a risk that the actual implementation of subjects learned during training could adversely affects the environment (e.g., training on agricultural techniques), the training is expected to include as part of its curriculum, an analysis of environmental effects a plan for mitigation. Mitigation measures such as Good Agricultural Practices/Best Management Practices would need to be identified for use in training as a mitigation measure and listed in Table 2 of the EMMP.

b) EDA Pilot Projects that cannot be supported (High-Risk):
If there is a proposed pilot project that may have significant environmental effects, an approved EA is required prior to its implementation. In the case of pesticide use, a Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP) will need to be prepared by the partner and approved by the CCCCC and National Project Coordinator. Such pilot projects include, but are not limited to:

- Agricultural, livestock introduction or other activities that involve forest conversion;
- Resettlement of human populations/impact on indigenous populations;
- Construction of water management systems (such as dams or impoundments);
- Drainage of wetlands/impact on mangrove stands;
- Introduction of exotic plants or animals in protected areas;
- Permanent modification of a coastal, marine or terrestrial habitat supporting an endangered species
- Installation of aquaculture systems in sensitive water bodies including rivers, lakes, and marine waters (not land-based fish ponds);
- Procurement of timber harvesting equipment, including chainsaws;
- Use of restricted use pesticides (insecticides, herbicides, fungicides, etc.);
- Large-scale reconstruction in un-degraded lands, such as within protected areas;
- Large-scale new construction (over 1,000 meters^2);

- Timber harvesting, or cutting of trees over 20 cm diameter breast height related to forest management or for commercial products;
- Construction of penetration roads and/or reroutes.
- Impact on shoreline integrity as a consequence of any coastal defence measure proposed.

c) Cumulative Effects

Even though individual pilot projects may be considered medium risk, when those pilot projects are analyzed in terms of other donor funded (including GCF or CCCCC) actions that are likely to occur, cumulative effects must be considered and may require the development of an EA.

d) Extraordinary circumstances

Certain extraordinary circumstances must be considered and may require an EA. These include

- impacts to sensitive terrestrial or coastal/aquatic areas (see question 14);
- impacts to unique cultural or historical features (see question 28).

Enter the Question/Row # of the potential negative effects with check marks in Column A and complete table below for mitigation measures to reduce or eliminate the issue. In the Sub-Activity or Component Column, list the main actions to be implemented. Under each action, list the tasks (Steps) that are needed to implement this action.

Table 5 Environmental Mitigation Plan

Name of Sub Project Country: _____
Specific Climate Change Parameter: _____
EDA Technical Measure Theme Area (see Appendix 3.1A above): _____
Proposed Project Cost: _____

# of the question from EDA Screening (Part 2)	Action or component with the different tasks required to implement the action.	Description of Environmental Effect	Environmental Mitigation Measures*
	Sub-Component 1		
	Step 1		
	Step 2		
	Step 3		
	Step 4		
	Step 5		
	Step 6		
	Sub-Component 2		
	Step 1		
	Step 2		
	Step 3		
	Step 4		
	Step 5		
	Step 6		
	Step 7		

Table 6 Environmental Monitoring Table

Award Number:
Project Name:
Executing Entity:
Location Name:
Nearby Communities:
Senior Activity Manager:

Monitoring Period:
Date:

#	Description of Mitigation Measure (same as in Table A2 or mitigation measures identified in EAs)	Responsible Party for implementing and monitoring mitigation measures	Monitoring Methods			Estimated Cost of implementing mitigation measures and monitoring	Results			Recommended Adjustments
			Indicators of implementation and effectiveness of indicators	Methods	Frequency		Dates Monitored	Problems Encountered	Mitigation Effectiveness	

[i] CCCCC. 2025. Complaints. https://caribbeanclimate.org/complaints/
[ii] CCCCC. 2025. Complaints. https://caribbeanclimate.org/complaints/
[iii] CCCCC. 2022. Environmental and Social Management System.