

D Subproject preparation, approval and implementation

This section outlines generic steps that the PO will facilitate, coordinate and oversee for subproject identification, preparation, approval and implementation using institutional arrangements and procedures outlined by the CFF. The typical project cycle includes three phases re: Phase 1 – identification and planning (1 – 6 months), Phase 2 – implementation (6 – 24 months), Phase 3 – management and operation (ongoing).

Preparation and application

A conservancy will have a Conservancy Management Plan in place prior to identifying and preparing a subproject application. Like with the CMP, the preparation of a subproject proposal should be consultative/ participatory and can be done in consultation with extension teams and/or a SO chosen by the conservancy. Technical guidance and input is crucial to ensure that all environmental and social concerns are thoroughly considered from the start of the identification and planning process. To facilitate environmental and social screening the ESMF provides a checklist for screening (Annex 1) and, information on typical project impacts and mitigation measures (Annex 2). The checklist will assist communities and extension/ SO staff with the identification of potential impacts based on available knowledge and field investigations. Once the checklist is completed, it serves as certification by the community and a technical assistance team (extension and/or SO staff), that the subproject funding application addressed all potential impacts and prescribes measures necessary to avoid or minimise adverse environmental and social impacts. In the event that initial screening of subproject applications suggests that environmental or social concerns are significant, procedures outlined in the ESMF will be followed to plan for minimisation or mitigation. Such procedures, for example, may include site-specific EIAs, pro-active participatory planning involving outreach to disadvantaged groups, or redesign of subproject proposals to provide adequate compensation for, or involvement by disadvantaged groups.

Some subproject situations and mitigation measures will need to be specified more precisely and in detail than others, either in the application or as an annex. Such subproject situations include;

- a. Land must be acquired, assets are impacted, someone's access to resources is restricted/ has changed, or loss of livelihood results for a subproject: The need for a RAP must be determined and, if needed, prepared according to guidelines appearing in the RPF of ICEMA.
- b. A subproject may affect a natural habitat or forest area: The application must describe how this subproject will avoid causing adverse effects on the area/habitat, as outlined in section F of this document.
- c. An indigenous people may be adversely affected by a subproject, or could benefit from it: The IPDP of ICEMA needs to be consulted and technical assistance sourced where necessary.

Special planning reports

Serious negative environmental and/or social impacts may necessitate one of the following Special Planning Reports; EMP (*also see section D*) – detailing monitoring and assessment of (cumulative) impacts and, mitigatory actions; and/or a RAP – detailing reasons for proposed resettlement, the proposed consultation plan with affected parties and a plan for actual implementation of proposed involuntary resettlement under the

subproject. The ESMF provides guidelines for such planning reports but ICEMA discourages the need for any Special Planning Reports under subprojects. In the event that a subproject proposal of high quality and potential necessitates special planning, ICEMA will source and avail technical assistance to the conservancy.

To ensure most effective use of resources a subproject application can be approved in principle on the condition that additional planning reports will be provided to the PO. In such situations this ESMF emphasises that; *a subproject cannot be finally approved and funded until such reports are received, approved and disclosed.*

A subproject application will not be considered if full community participation (or representation thereof) was not part of the subproject identification and preparation processes.

Appraisal and approval

Subproject appraisal and approval will follow the process as outlined below. It is essential that all CBNRM stakeholders, especially conservancy members are familiar with this process and know and understand the roles and responsibilities of various authorities/technical people at different levels as appropriate.

ICEMA PO serves as the review and approval authority for final (desk/field) appraisal and approval.

The ESMF is mindful of the Namibian conservancy context and does not commit subproject appraisal and approval to a rigid process. Each subproject application will be considered based on its scope, nature and potential impact. Two scenarios are elaborated below to demonstrate the flexibility and pragmatism of the approach.

A relatively large subproject, e.g. community lodge, may require higher level technical input (re: quantity surveying, architectural, construction), approval from authorities (access to land/other resources), an EIA, an EMP, a RAP where necessary and a rigorous monitoring programme. In this situation, the PO will identify and attract relevant technical expertise to assist communities and, the appraisal and approval process will take longer. In contrast, a community may apply for once-off funding for equipment to start an activity, e.g. an electrical saw for wood production. The CFF funding is thus sourced for procurement and resource mobilisation and not operational cost. In this instance, the activity may not pose severe environmental (collection of dead wood) and social (no resettlement and/or exclusion of minorities) harm will not trigger any safeguard and no higher level technical input is necessary. The PO thus follows standard procurement procedure for the equipment. In this scenario, very little time is lost and communities can as soon as possible engage in their proposed activity. For such small funding applications the community must still demonstrate involvement, benefit sharing and the potential future sustainability of the activity.

Appraisal

Once the community has finalised the application it is submitted to the PO for appraisal and approval.

The first step in a *desk appraisal* is to determine if all relevant information has been provided, and if it is adequate.

From an environmental and social point of view, the PO will determine whether the community and extension team have thoroughly considered all the potential adverse effects of the subproject, and included measures in the subproject plan to adequately address them. This will be based on a certified checklist submitted to the PO (Annex 1).

If the desk appraisal finds that environmental and social impacts were not adequately considered, or meets specific criteria as indicated in Annex 3, the PO requires a *field appraisal* before the application will be considered further. The PO will source necessary expertise to embark on a field visit to determine the extent of potential environmental and social impact by the subproject. Such expertise can be sourced from the TSAR or elsewhere. The field appraisal will make reference to the checklists completed and certified by the community and extension team and, will make recommendations for special planning based on new findings.

Following the field appraisal the PO will, when relevant/necessary, prescribe conditions of approval. If such a condition is the production of a Special Planning Report, a timeline will be agreed for its production and submission. The subproject application can only be finally approved upon receipt thereof.

Approval

When the PO finds a subproject application satisfactory in terms of the guidelines, conditions and procedures in this ESMF the application will be approved and communities will engage in a grant agreement with ICEMA.

Disclosure of subproject information

Before a subproject is approved the PO will make Special Planning Reports (IPDP, EIA, EMP, RAP) available for public review at a place accessible to local people and in a form, manner and language they can understand. The general public will be invited to comment on these reports prior to their approval.

Reports

As a general rule, subprojects with a lifespan of one year or more will report to the ICEMA PO on a quarterly basis. Subprojects with a lifespan of three months to one year will report to the ICEMA PO on a monthly basis. Depending on the scope and nature of the subproject the PO and conservancy can agree on different reporting modalities.

Mid-term review

The ICEMA Project and this ESMF will be reviewed by an independent consultant 36 months after ICEMA became effective. The purpose of the reviews is;

For ICEMA

- Management performance: project response to community demands, efficiency in procurement, disbursement, accounting practices and subproject cost control;
- Physical implementation of project targets, implementation rate and investment spread across sites

For the ESMF

- to assess compliance with ESMF procedures, learn lessons, and improve future ESMF performance; and
- to assess the occurrence of, and potential for, cumulative impacts due to Project-funded activities.